TSD File Inventory Index

Date: March 17, 2006

Initial: C McKenzie

Facility Name: Caterpillar Inc. (Aurora Plant - Old Technical Site)

Facility Identification Number: ILD 005 070 657

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.1 Correspondence	V	.2 All Other Permitting Documents (Not Part of the ARA)	
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Total - 1

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7 Lab Data - Soil Sampling / Groundwater			

Note: Transmittal Letter to Be Included with Reports.
Comments: Use file date

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

REPLY TO THE ATTENTION OF:

December 31, 1992

CATERPILLAR INC AURORA PLANT
ATTN ANN HASTERT
RTE 31 BOX 348
AURORA IL 60507

RE: US EPA ID Number ILD 005 070 651

Location: RTE 31 BOX 348

AURORA IL

In response to your correspondence of NOV 17 1992, the following information has been updated:

Contact change to	ANN HASTERT 708-859-5417
Legal owner change to	CATERPILLAR INC AURORA PLANT

If you have any questions, please call me at (312) 886-6173.

Sincerely,

Sharon Kiddon

Sharon Kiddon
RCRA Notifications Coordinator
Waste Management Division

cc: State Agency
File

UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY
REGION V
111 West Jackson Blvd.
CHICAGO, ILLINOIS 60604

REPLY TO ATTENTION OF:
RCRA ACTIVITIES

APR 12 1982

Robert R. Bohannan
Hazardous Material Coordinator
Caterpillar Tractor Co.
Box 348
Aurora, IL 60507

RE: Interim Status Acknowledgement USEPA ID No. ILD005070651
FACILITY NAME: Caterpillar Tractor Co.
Dear Mr. Bohannan:

This is to acknowledge that the U.S. Environmental Protection Agency (USEPA) has completed processing your Part A Hazardous Waste Permit Application. It is the opinion of this office that the information submitted is complete and that you, as an owner or operator of a hazardous waste management facility, have met the requirements of Section 3005(e) of the Resource Conservation and Recovery Act (RCRA) for Interim Status. However, should USEPA obtain information which indicates that your application was incomplete or inaccurate, you may be requested to provide further documentation of your claim for Interim Status. Our opinion will be reevaluated on the basis of this information.

As an owner or operator of a hazardous waste management facility, you are required to comply with the interim status standards as prescribed in 40 CFR Parts 122 and 265, or with State rules and regulations in those States which have been authorized under Section 3006 of RCRA. In addition, you are reminded that operating under interim status does not relieve you from the need to comply with all applicable State and local requirements.

The printout enclosed with this letter identifies the limit(s) of the process design capacities your facility may use during the interim status period. This information was obtained from your Part A Permit application. If you wish to handle new wastes, to change processes, to increase the design capacity of existing processes, or to change ownership or operational control of the facility, you may do so only as provided in 40 CFR Sections 122.22 and 122.23.

As stated in the first paragraph of this letter, you have met the requirements of 40 CFR Part 122.23; your facility may operate under interim status until such time as a permit is issued or denied. This will be preceded by a request from this office or the State (if authorized) for Part B of your application. Please contact Arthur Kawatachi of my staff at (312) 886-7449, if you have any questions concerning this letter or the enclosure.

Sincerely yours,

GRH 4/12/82

Karl J. Klepitsch, Jr., Chief
Waste Management Branch

Enclosure

cc: Donald F. Domnick, Vice President

CATERPILLAR®

Caterpillar Inc.
Box 348
Aurora, Illinois 60507

October 28, 1992

U.S. EPA Region V
RCRA Activities
Waste Management Division
P.O. Box A3587
Chicago, IL 60690

Dear Sir,

Enclosed is a revised Notification of Regulated Waste Activity (Form 8700-12) for our Aurora facility. We have ceased being a hazardous waste storage facility. After closure through the Illinois EPA, we are now a hazardous waste generator only.

If you have any questions please contact me.

Sincerely,

Ann Hastert

Environmental Coordinator

Ann Hastert
Caterpillar Inc.
Facilities Engineering
Box 348 Rt. 31
Aurora, Illinois 60507
(708) 859-5417
Attach.

Please print or type with ELITE type (12 characters per inch) in the unshaded areas only

Form Approved. OMB No. 2050-0028. Expires 10-31-91
GSA No. 0246-EPA-OT

Please refer to the *Instructions for Filing Notification* before completing this form. The information requested here is required by law *(Section 3010 of the Resource Conservation and Recovery Act).*

EPA Notification of Regulated Waste Activity

United States Environmental Protection Agency

Date Received (For Official Use Only)
NOV 17 1992
U. S. EPA, REGION V

I. Installation's EPA ID Number *(Mark 'X' in the appropriate box)*

[ ] A. First Notification [X] B. Subsequent Notification *(complete item C)*

C. Installation's EPA ID Number: ILD005070651

II. Name of Installation *(Include company and specific site name)* 0938070002

CATERPILLAR INC - AURORA PLANT

III. Location of Installation *(Physical address not P.O. Box or Route Number)*

Street: ROUTE 31 BOX 348

Street (continued):

City or Town: AURORA | State: IL | ZIP Code: 60507-

County Code: | County Name: KENDALL

IV. Installation Mailing Address *(See instructions)*

Street or P.O. Box: SAME

City or Town: | State: | ZIP Code: -

V. Installation Contact *(Person to be contacted regarding waste activities at site)*

C-

Name *(last)*: HASTERT | *(first)*: ANN

Job Title: ENVIRONMENTAL

C-

Phone Number *(area code and number)*: 708-859-5417

VI. Installation Contact Address *(See instructions)*

A-

A. Contact Address Location: X | Mailing: | B. Street or P.O. Box:

A-

City or Town: | State: | ZIP Code: -

VII. Ownership *(See instructions)*

A-

A. Name of Installation's Legal Owner: SAME

Street, P.O. Box, or Route Number:

City or Town: | State: | ZIP Code: -

Phone Number *(area code and number)*: 708-859-5000

B. Land Type: P | C. Owner Type: P | D. Change of Owner Indicator: Yes [ ] No [X] | (Date Changed) Month Day Year:

3

EPA Form 8700-12 (01-90) Previous edition is obsolete.

Continue on reverse

Please print or type with ELITE type (12 characters per inch) in the unshaded areas only

Form Approved. OMB No. 2050-0028. Expires 9-31-91
GSA No. 0246-EPA-OT

ID - For Official Use Only

VIII. Type of Regulated Waste Activity *(Mark 'X' in the appropriate boxes. Refer to instructions.)*

A. Hazardous Waste Activity

1. Generator (See Instructions)
   - [X] a. Greater than 1000kg/mo (2,200 lbs.)
   - [ ] b. 100 to 1000 kg/mo (220 - 2,200 lbs.)
   - [ ] c. Less than 100 kg/mo (220 lbs.)
2. Transporter (Indicate Mode in boxes 1-5 below)
   - [ ] a. For own waste only
   - [ ] b. For commercial purposes

   Mode of Transportation
   - [ ] 1. Air
   - [ ] 2. Rail
   - [ ] 3. Highway
   - [ ] 4. Water
   - [ ] 5. Other - specify
3. [ ] Treater, Storer, Disposer (at installation) Note: A permit is required for this activity; see instructions.
4. Hazardous Waste Fuel
   - [ ] a. Generator Marketing to Burner
   - [ ] b. Other Marketers
   - [ ] c. Burner - indicate device(s) - Type of Combustion Device
     - [ ] 1. Utility Boiler
     - [ ] 2. Industrial Boiler
     - [ ] 3. Industrial Furnace
5. [ ] Underground Injection Control

B. Used Oil Fuel Activities

1. Off-Specification Used Oil Fuel
   - [ ] a. Generator Marketing to Burner
   - [ ] b. Other Markerer
   - [ ] c. Burner - indicate device(s) - Type of Combustion Device
     - [ ] 1. Utility Boiler
     - [ ] 2. Industrial Boiler
     - [ ] 3. Industrial Furnace
2. [ ] Specification Used Oil Fuel Marketer (or On-site Burner) Who First Claims the Oil Meets the Specification

IX. Description of Regulated Wastes *(Use additional sheets if necessary)*

A. Characteristics of Nonlisted Hazardous Wastes. Mark 'X' in the boxes corresponding to the characteristics of nonlisted hazardous wastes your installation handles. *(See 40 CFR Parts 261.20 - 261.24)*

1. Ignitable (D001)	2. Corrosive (D002)	3. Reactive (D003)	4. EP Toxic (D000)	(List specific EPA hazardous waste number(s) for the EP Toxic contaminant(s))
X	X			

B. Listed Hazardous Wastes. (See 40 CFR 261.31 - 33. See instructions if you need to list more than 12 waste codes.)

1	2	3	4	5	6
F003					
7	**8**	**9**	**10**	**11**	**12**

C. Other Wastes. (State or other wastes requiring an I.D. number. See instructions.)

1	2	3	4	5	6

X. Certification

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fines and imprisonment.

Signature	Name and Official Title *(type or print)*	Date Signed
Allan J. Rassi	ALAN J. RASSI, VICE PRESIDENT	10/27/92

XI. Comments

WE HAVE CHANGED OUR STATUS FROM A HAZARDOUS WASTE STORAGE FACILITY TO THAT OF A HAZARDOUS WASTE GENERATOR. WE HAVE WITHDRAWN OUR PART A FORM AND RECEIVED OFFICIAL NOTIFICATION OF CLOSURE FROM THE IEPA ON FEBRUARY 22, 1991.

Note: Mail completed form to the appropriate EPA Regional or State Office. (See Section III of the booklet for addresses.)

EPA

ACKNOWLEDGEMENT OF NOTIFICATION OF HAZARDOUS WASTE ACTIVITY
(VERIFICATION)

This is to acknowledge that you have filed a Notification of Hazardous Waste Activity for the installation located at the address shown in the box below to comply with Section 3010 of the Resource Conservation and Recovery Act *(RCRA)*. Your EPA Identification Number for that installation appears in the box below. The EPA Identification Number must be included on all shipping manifests for transporting hazardous wastes; on all Annual Reports that generators of hazardous waste, and owners and operators of hazardous waste treatment, storage and disposal facilities must file with EPA; on all applications for a Federal Hazardous Waste Permit; and other hazardous waste management reports and documents required under Subtitle C of RCRA.

EPA I.D. NUMBER → ILD005070651 REACKNOWLEDGEMENT

CATERPILLAR TRACTOR COMPANY
PO BOX 348
AURORA IL 60507

INSTALLATION ADDRESS →

RTE 31 SOUTH
AURORA IL 60507

EPA Form 8700-12B (4-80)

09/28/81

CATERPILLAR TRACTOR CO.

Box 348
Aurora, Illinois 60507

September 24, 1980

Karl J. Klepitsch Jr.
Waste Management Branch
230 So. Dearborn Street
Chicago, Il., 60604

Dear Mr. Klepitsch

Enclosed is subsequent notification for hazardous waste activities, regarding newly regulated waste under the July 18, 1980, Federal Register.

We have been issued on EPA I.D. number for our primary facility, and are merely informing your office of our regulated activities at present.

Very truly yours,

John D. Winters

Plant Manager

JDWinters
(312) 859-5212
MEB/bb


CERTIFIED
P13 4476939
MAIL

Please print or type with ELITE type *(12 characters/inch)* in the unshaded areas only.

GSA No. 0246-EPA-OT

EPA — U.S. ENVIRONMENTAL PROTECTION AGENCY
NOTIFICATION OF HAZARDOUS WASTE ACTIVITY

INSTALLATION'S EPA I.D. NO.

I. NAME OF INSTALLATION

II. INSTALLATION MAILING ADDRESS

III. LOCATION OF INSTALLATION

PLEASE PLACE LABEL IN THIS SPACE

INSTRUCTIONS: If you received a preprinted label, affix it in the space at left. If any of the information on the label is incorrect, draw a line through it and supply the correct information in the appropriate section below. If the label is complete and correct, leave Items I, II, and III below blank. If you did not receive a preprinted label, complete all items. "Installation" means a single site where hazardous waste is generated, treated, stored and/or disposed of, or a transporter's principal place of business. Please refer to the INSTRUCTIONS FOR FILING NOTIFICATION before completing this form. The information requested herein is required by law *(Section 3010 of the Resource Conservation and Recovery Act).*

FOR OFFICIAL USE ONLY

COMMENTS: C

INSTALLATION'S EPA I.D. NUMBER	APPROVED	DATE RECEIVED (yr., mo., & day)
F ILD005070651 T/A 2 C 1	11	800924

I. NAME OF INSTALLATION

CATERPILLAR TRACTOR CO

II. INSTALLATION MAILING ADDRESS

STREET OR P.O. BOX: 3 BOX 348

CITY OR TOWN	ST.	ZIP CODE
4 Aurora	IL	60507

III. LOCATION OF INSTALLATION

STREET OR ROUTE NUMBER: 5 RTE 31 SOUTH

CITY OR TOWN	ST.	ZIP CODE
6 AURORA	IL	60507

IV. INSTALLATION CONTACT

NAME AND TITLE (last, first, & job title)	PHONE NO. (area code & no.)
2 BARNETT MADELENE HAZ MAT COORD	312-859-4716

V. OWNERSHIP

A. NAME OF INSTALLATION'S LEGAL OWNER: 8 CATERPILLAR TRACTOR CO

B. TYPE OF OWNERSHIP *(enter the appropriate letter into box)*

F = FEDERAL
M = NON–FEDERAL

Entered: M

VI. TYPE OF HAZARDOUS WASTE ACTIVITY *(enter "X" in the appropriate box(es))*

- [ ] A. GENERATION
- [X] B. TRANSPORTATION *(complete item VII)*
- [ ] C. TREAT/STORE/DISPOSE
- [ ] D. UNDERGROUND INJECTION

VII. MODE OF TRANSPORTATION *(transporters only – enter "X" in the appropriate box(es))*

- [ ] A. AIR
- [ ] B. RAIL
- [X] C. HIGHWAY
- [ ] D. WATER
- [ ] E. OTHER *(specify)*:

VIII. FIRST OR SUBSEQUENT NOTIFICATION

Mark "X" in the appropriate box to indicate whether this is your installation's first notification of hazardous waste activity or a subsequent notification. If this is not your first notification, enter your Installation's EPA I.D. Number in the space provided below.

- [ ] A. FIRST NOTIFICATION
- [X] B. SUBSEQUENT NOTIFICATION *(complete item C)*

C. INSTALLATION'S EPA I.D. NO.: ILD005070651

IX. DESCRIPTION OF HAZARDOUS WASTES

Please go to the reverse of this form and provide the requested information.

EPA Form 8700-12 (6-80)

CONTINUE ON REVERSE

SEP 24 1980

DETACH A

DETACH 3

I.D. – FOR OFFICIAL USE ONLY

W I L D 0 0 5 0 7 0 6 5 1 1

IX. DESCRIPTION OF HAZARDOUS WASTES *(continued from front)*

A. HAZARDOUS WASTES FROM NON–SPECIFIC SOURCES. Enter the four–digit number from 40 CFR Part 261.31 for each listed hazardous waste from non–specific sources your installation handles. Use additional sheets if necessary.

1	2	3	4	5	6
F017	F018				
7	**8**	**9**	**10**	**11**	**12**

B. HAZARDOUS WASTES FROM SPECIFIC SOURCES. Enter the four–digit number from 40 CFR Part 261.32 for each listed hazardous waste from specific industrial sources your installation handles. Use additional sheets if necessary.

13	14	15	16	17	18
19	**20**	**21**	**22**	**23**	**24**
25	**26**	**27**	**28**	**29**	**30**

C. COMMERCIAL CHEMICAL PRODUCT HAZARDOUS WASTES. Enter the four–digit number from 40 CFR Part 261.33 for each chemical substance your installation handles which may be a hazardous waste. Use additional sheets if necessary.

31	32	33	34	35	36
37	**38**	**39**	**40**	**41**	**42**
43	**44**	**45**	**46**	**47**	**48**

D. LISTED INFECTIOUS WASTES. Enter the four–digit number from 40 CFR Part 261.34 for each listed hazardous waste from hospitals, veterinary hospitals, medical and research laboratories your installation handles. Use additional sheets if necessary.

49	50	51	52	53	54

E. CHARACTERISTICS OF NON–LISTED HAZARDOUS WASTES. Mark "X" in the boxes corresponding to the characteristics of non–listed hazardous wastes your installation handles. *(See 40 CFR Parts 261.21 – 261.24.)*

☐ 1. IGNITABLE (D001) ☐ 2. CORROSIVE (D002) ☐ 3. REACTIVE (D003) ☐ 4. TOXIC (D000)

X. CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

SIGNATURE	NAME & OFFICIAL TITLE *(type or print)*	DATE SIGNED
John D. Winters	Plant Manager	9/24/80

EPA Form 8700-12 (6-80) REVERSE

CATERPILLAR TRACTOR CO.

Box 348
Aurora, Illinois 60507

July 10, 1980

Karl J. Klepitsch Jr.
Waste Management Branch
230 So. Dearborn Street
Chicago, Il., 60604

Dear Mr. Klepitsch

Enclosed are two notification forms for hazardous waste activities, representing the activities at our primary plant site and at a second site. We have been issued an EPA I.D. number for the primary facility and are seeking an EPA I.D. for the second site.

Very truly yours,

John D. Winters

Plant Manager

J. D. Winters
(312) 859-5212
bb

Enc. (2)

ILD005070651

CERTIFIED

P13 4476791

MAIL

Please print or type with ELITE type *(12 characters/inch)* in the unshaded areas only.

GSA No. 0246-EPA-OT

EPA U.S. ENVIRONMENTAL PROTECTION AGENCY

NOTIFICATION OF HAZARDOUS WASTE ACTIVITY

INSTRUCTIONS: If you received a preprinted label, affix it in the space at left. If any of the information on the label is incorrect, draw a line through it and supply the correct information in the appropriate section below. If the label is complete and correct, leave Items I, II, and III below blank. If you did not receive a preprinted label, complete all items. "Installation" means a single site where hazardous waste is generated, treated, stored and/or disposed of, or a transporter's principal place of business. Please refer to the INSTRUCTIONS FOR FILING NOTIFICATION before completing this form. The information requested herein is required by law *(Section 3010 of the Resource Conservation and Recovery Act).*

INSTALLATION'S EPA I.D. NO. ILD005070651

I. NAME OF INSTALLATION CATERPILLAR TRACTOR CO*

II. INSTALLATION MAILING ADDRESS PO BOX 348 AURORA, IL 60507

III. LOCATION OF INSTALLATION RTE 31 SOUTH AURORA, IL 60507

DETACH A

FOR OFFICIAL USE ONLY

COMMENTS

INSTALLATION'S EPA I.D. NUMBER: F ILD005070651 T/A 1 — APPROVED: A — DATE RECEIVED (yr., mo., & day): 800717

000022

I. NAME OF INSTALLATION

II. INSTALLATION MAILING ADDRESS

STREET OR P.O. BOX: 3

CITY OR TOWN: 4 — ST. — ZIP CODE

II. LOCATION OF INSTALLATION

STREET OR ROUTE NUMBER: 5

CITY OR TOWN: 6 — ST. — ZIP CODE

IV. INSTALLATION CONTACT

NAME AND TITLE *(last, first, & job title)*: 2 Barnett Madelene Haz.Mat.Coord — PHONE NO. *(area code & no.)*: 312-859-4716

V. OWNERSHIP

A. NAME OF INSTALLATION'S LEGAL OWNER: 8 Caterpillar Tractor Co.

B. TYPE OF OWNERSHIP *(enter the appropriate letter into box)*: F = FEDERAL, M = NON–FEDERAL — M

VI. TYPE OF HAZARDOUS WASTE ACTIVITY *(enter "X" in the appropriate box(es))*

- [X] A. GENERATION
- [ ] B. TRANSPORTATION *(complete item VII)*
- [X] C. TREAT/STORE/DISPOSE
- [ ] D. UNDERGROUND INJECTION

VII. MODE OF TRANSPORTATION *(transporters only – enter "X" in the appropriate box(es))*

- [ ] A. AIR
- [ ] B. RAIL
- [ ] C. HIGHWAY
- [ ] D. WATER
- [ ] E. OTHER *(specify):*

VIII. FIRST OR SUBSEQUENT NOTIFICATION

Mark "X" in the appropriate box to indicate whether this is your installation's first notification of hazardous waste activity or a subsequent notification. If this is not your first notification, enter your Installation's EPA I.D. Number in the space provided below.

- [X] A. FIRST NOTIFICATION
- [ ] B. SUBSEQUENT NOTIFICATION *(complete item C)*

C. INSTALLATION'S EPA I.D. NO.: ILD005070651

IX. DESCRIPTION OF HAZARDOUS WASTES

Please go to the reverse of this form and provide the requested information.

JUL 16 1980

CONTINUE ON REVERSE

I.D. – FOR OFFICIAL USE ONLY

W | 0 0 5 0 7 0 6 5 1 | T/A: 2 | C: 1

IX. DESCRIPTION OF HAZARDOUS WASTES *(continued from front)*

A. HAZARDOUS WASTES FROM NON–SPECIFIC SOURCES. Enter the four–digit number from 40 CFR Part 261.31 for each listed hazardous waste from non–specific sources your installation handles. Use additional sheets if necessary.

1	2	3	4	5	6
F001	F004	F005	F006	F007	F010
7	**8**	**9**	**10**	**11**	**12**
F012	F017	F018			

B. HAZARDOUS WASTES FROM SPECIFIC SOURCES. Enter the four–digit number from 40 CFR Part 261.32 for each listed hazardous waste from specific industrial sources your installation handles. Use additional sheets if necessary.

13	14	15	16	17	18
K062					
19	**20**	**21**	**22**	**23**	**24**
25	**26**	**27**	**28**	**29**	**30**

C. COMMERCIAL CHEMICAL PRODUCT HAZARDOUS WASTES. Enter the four–digit number from 40 CFR Part 261.33 for each chemical substance your installation handles which may be a hazardous waste. Use additional sheets if necessary.

31	32	33	34	35	36
P001	P002	P068	P089	U013	U051
37	**38**	**39**	**40**	**41**	**42**
U052	U054	U075	U154	U226	
43	**44**	**45**	**46**	**47**	**48**

D. LISTED INFECTIOUS WASTES. Enter the four–digit number from 40 CFR Part 261.34 for each listed hazardous waste from hospitals, veterinary hospitals, medical and research laboratories your installation handles. Use additional sheets if necessary.

49	50	51	52	53	54

E. CHARACTERISTICS OF NON–LISTED HAZARDOUS WASTES. Mark "X" in the boxes corresponding to the characteristics of non–listed hazardous wastes your installation handles. *(See 40 CFR Parts 261.21 – 261.24.)*

[X] 1. IGNITABLE (D001)	[X] 2. CORROSIVE (D002)	[ ] 3. REACTIVE (D003)	[X] 4. TOXIC (D000)

X. CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

SIGNATURE	NAME & OFFICIAL TITLE *(type or print)*	DATE SIGNED
John D. Winters	Plant Manager	July 10, 1980

CATERPILLAR TRACTOR CO.

Contact changed 3-31-82 MBP

orig to PA
copies to Notif Folders

Box 348
Aurora, Illinois 60507

March 24, 1982

Lisa Binder
RCRA Activities
USEPA - Region V
P.O. Box A 3587
Chicago, Illinois 60690

Dear Ms. Binder:

In order to keep your records up to date, please make the following change. Mr. Robert R. Bohannan has replaced Ms. Madge Barnett as the Hazardous Materials Coordinator. Please address any further coorespondence to his attention or call 312-859-4716.

Sincerely,

Robert R. Bohannan

R. R. Bohannan
Hazardous Material Coordinator

RRB/ls

P.S. The associated EPA ID numbers in which he has responsibility are:

ILD005070651 q, T, TSD, PA
ILT180011918 generator only ✓

Please print or type in the unshaded areas only
(fill—in areas are spaced for elite type, i.e., 12 characters/inch).

Form Approved OMB No. 158-R0175

FORM 1 GENERAL

U.S. ENVIRONMENTAL PROTECTION AGENCY

GENERAL INFORMATION

Consolidated Permits Program
(Read the "General Instructions" before starting.)

EPA I.D. NUMBER

F | I L D 0 0 5 0 7 0 6 5 1 | T/A | C = D

LABEL ITEMS

- I. EPA I.D. NUMBER
- III. FACILITY NAME
- V. FACILITY MAILING ADDRESS
- VI. FACILITY LOCATION

PLEASE PLACE LABEL IN THIS SPACE

GENERAL INSTRUCTIONS

If a preprinted label has been provided, affix it in the designated space. Review the information carefully; if any of it is incorrect, cross through it and enter the correct data in the appropriate fill—in area below. Also, if any of the preprinted data is absent *(the area to the left of the label space lists the information that should appear)*, please provide it in the proper fill—in area*(s)* below. If the label is complete and correct, you need not complete Items I, III, V, and VI *(except VI-B which must be completed regardless)*. Complete all items if no label has been provided. Refer to the instructions for detailed item descriptions and for the legal authorizations under which this data is collected.

II. POLLUTANT CHARACTERISTICS

INSTRUCTIONS: Complete A through J to determine whether you need to submit any permit application forms to the EPA. If you answer "yes" to any questions, you must submit this form and the supplemental form listed in the parenthesis following the question. Mark "X" in the box in the third column if the supplemental form is attached. If you answer "no" to each question, you need not submit any of these forms. You may answer "no" if your activity is excluded from permit requirements; see Section C of the instructions. See also, Section D of the instructions for definitions of **bold—faced terms.**

SPECIFIC QUESTIONS	MARK 'X' YES	NO	FORM ATTACHED
A. Is this facility a **publicly owned treatment works** which results in a **discharge** to **waters of the U.S.**? (FORM 2A)		X	
B. Does or will this facility *(either existing or proposed)* include a **concentrated animal feeding operation** or **aquatic animal production facility** which results in a **discharge** to **waters of the U.S.**? (FORM 2B)		X	
C. Is this a facility which currently results in **discharges** to **waters of the U.S.** other than those described in A or B above? (FORM 2C)		X	
D. Is this a proposed facility *(other than those described in A or B above)* which will result in a **discharge** to **waters of the U.S.**? (FORM 2D)		X	
E. Does or will this facility treat, store, or dispose of **hazardous wastes**? (FORM 3)	X		
F. Do you or will you inject at this facility industrial or municipal effluent below the lowermost stratum containing, within one quarter mile of the well bore, underground sources of drinking water? (FORM 4)		X	
G. Do you or will you inject at this facility any produced water or other fluids which are brought to the surface in connection with conventional oil or natural gas production, inject fluids used for enhanced recovery of oil or natural gas, or inject fluids for storage of liquid hydrocarbons? (FORM 4)		X	
H. Do you or will you inject at this facility fluids for special processes such as mining of sulfur by the Frasch process, solution mining of minerals, in situ combustion of fossil fuel, or recovery of geothermal energy? (FORM 4)		X	
I. Is this facility a proposed **stationary source** which is one of the 28 industrial categories listed in the instructions and which will potentially emit 100 tons per year of any air pollutant regulated under the Clean Air Act and may affect or be located in an **attainment area**? (FORM 5)	X		
J. Is this facility a proposed **stationary source** which is NOT one of the 28 industrial categories listed in the instructions and which will potentially emit 250 tons per year of any air pollutant regulated under the Clean Air Act and may affect or be located in an **attainment area**? (FORM 5)		X	

III. NAME OF FACILITY

1 SKIP: CATERPILLAR TRACTOR CO.

IV. FACILITY CONTACT

A. NAME & TITLE *(last, first, & title)*	B. PHONE *(area code & no.)*
2 BARNETT MADELENE HAZ.MAT.COORD	312 859 5000

V. FACILITY MAILING ADDRESS

A. STREET OR P.O. BOX

3 BOX 348

B. CITY OR TOWN	C. STATE	D. ZIP CODE
4 AURORA	IL	60507

VI. FACILITY LOCATION

A. STREET, ROUTE NO. OR OTHER SPECIFIC IDENTIFIER

5 ROUTE 31

B. COUNTY NAME

KENDALL

C. CITY OR TOWN	D. STATE	E. ZIP CODE	F. COUNTY CODE *(if known)*
6 AURORA	IL	60507	

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CONTINUE ON REVERSE

CONTINUED FROM THE FRONT

VII. SIC CODES (4-digit, in order of priority)

A. FIRST	B. SECOND
3531 (specify) Construction Machinery	(specify)

C. THIRD	D. FOURTH
(specify)	(specify)

VIII. OPERATOR INFORMATION

A. NAME: CATERPILLAR TRACTOR CO

B. Is the name listed in Item VIII-A also the owner? [X] YES [ ] NO

C. STATUS OF OPERATOR (Enter the appropriate letter into the answer box; if "Other", specify.)
F = FEDERAL, S = STATE, P = PRIVATE, M = PUBLIC (other than federal or state), O = OTHER (specify)
P (specify)

D. PHONE (area code & no.): A 309 675 1000

E. STREET OR P.O. BOX: 100 N.E. ADAMS STREET

F. CITY OR TOWN: B PEORIA

G. STATE: IL

H. ZIP CODE: 61629

IX. INDIAN LAND

Is the facility located on Indian lands? [ ] YES [X] NO

X. EXISTING ENVIRONMENTAL PERMITS

A. NPDES (Discharges to Surface Water)	D. PSD (Air Emissions from Proposed Sources)
9 N N.A.	9 P N.A.

B. UIC (Underground Injection of Fluids)	E. OTHER (specify)
9 U N.A.	9 (specify) See Attached Sheet

C. RCRA (Hazardous Wastes)	E. OTHER (specify)
9 R N.A.	9 (specify)

XI. MAP

Attach to this application a topographic map of the area extending to at least one mile beyond property bounderies. The map must show the outline of the facility, the location of each of its existing and proposed intake and discharge structures, each of its hazardous waste treatment, storage, or disposal facilities, and each well where it injects fluids underground. Include all springs, rivers and other surface water bodies in the map area. See instructions for precise requirements.

XII. NATURE OF BUSINESS (provide a brief description)

Manufacturer of Materials Handling Equipment

XIII. CERTIFICATION (see instructions)

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this application and all attachments and that, based on my inquiry of those persons immediately responsible for obtaining the information contained in the application, I believe that the information is true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME & OFFICIAL TITLE (type or print)	B. SIGNATURE	C. DATE SIGNED
Donald F. Domnick Vice President	D F Domnick	Sept 12, 1980

COMMENTS FOR OFFICIAL USE ONLY

ase print or type in the unshaded areas only
l—in areas are spaced for elite type, i.e., 12 characters/inch).

Form Approved OMB No. 158-S80004

FORM 3 RCRA

EPA

U.S. ENVIRONMENTAL PROTECTION AGENCY

HAZARDOUS WASTE PERMIT APPLICATION

Consolidated Permits Program

(This information is required under Section 3005 of RCRA.)

EPA I.D. NUMBER: F I L D 0 0 5 0 7 0 6 5 1 | T/A: | C: 1

FOR OFFICIAL USE ONLY

APPLICATION APPROVED	DATE RECEIVED (yr., mo., & day)	COMMENTS

II. FIRST OR REVISED APPLICATION

Place an "X" in the appropriate box in A or B below *(mark one box only)* to indicate whether this is the first application you are submitting for your facility or a revised application. If this is your first application and you already know your facility's EPA I.D. Number, or if this is a revised application, enter your facility's EPA I.D. Number in Item I above.

A. FIRST APPLICATION *(place an "X" below and provide the appropriate date)*

[X] 1. EXISTING FACILITY *(See instructions for definition of "existing" facility. Complete item below.)*

[ ] 2. NEW FACILITY *(Complete item below.)*

C: 8

FOR EXISTING FACILITIES, PROVIDE THE DATE *(yr., mo., & day)* OPERATION BEGAN OR THE DATE CONSTRUCTION COMMENCED *(use the boxes to the left)*

YR.	MO.	DAY
5 6	0 8	2 2

FOR NEW FACILITIES, PROVIDE THE DATE *(yr., mo., & day)* OPERATION BEGAN OR IS EXPECTED TO BEGIN

YR.	MO.	DAY

B. REVISED APPLICATION *(place an "X" below and complete Item I above)*

[ ] 1. FACILITY HAS INTERIM STATUS

[ ] 2. FACILITY HAS A RCRA PERMIT

III. PROCESSES – CODES AND DESIGN CAPACITIES

A. PROCESS CODE – Enter the code from the list of process codes below that best describes each process to be used at the facility. Ten lines are provided for entering codes. If more lines are needed, enter the code(s) in the space provided. If a process will be used that is not included in the list of codes below, then describe the process *(including its design capacity)* in the space provided on the form *(Item III-C).*

B. PROCESS DESIGN CAPACITY – For each code entered in column A enter the capacity of the process.

1. AMOUNT – Enter the amount.
2. UNIT OF MEASURE – For each amount entered in column B(1), enter the code from the list of unit measure codes below that describes the unit of measure used. Only the units of measure that are listed below should be used.

PROCESS	PROCESS CODE	APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY
Storage:		
CONTAINER *(barrel, drum, etc.)*	S01	GALLONS OR LITERS
TANK	S02	GALLONS OR LITERS
WASTE PILE	S03	CUBIC YARDS OR CUBIC METERS
SURFACE IMPOUNDMENT	S04	GALLONS OR LITERS
Disposal:		
INJECTION WELL	D79	GALLONS OR LITERS
LANDFILL	D80	ACRE-FEET *(the volume that would cover one acre to a depth of one foot)* OR HECTARE-METER
LAND APPLICATION	D81	ACRES OR HECTARES
OCEAN DISPOSAL	D82	GALLONS PER DAY OR LITERS PER DAY
SURFACE IMPOUNDMENT	D83	GALLONS OR LITERS

PROCESS	PROCESS CODE	APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY
Treatment:		
TANK	T01	GALLONS PER DAY OR LITERS PER DAY
SURFACE IMPOUNDMENT	T02	GALLONS PER DAY OR LITERS PER DAY
INCINERATOR	T03	TONS PER HOUR OR METRIC TONS PER HOUR; GALLONS PER HOUR OR LITERS PER HOUR
OTHER *(Use for physical, chemical, thermal or biological treatment processes not occurring in tanks, surface impoundments or incinerators. Describe the processes in the space provided; Item III-C.)*	T04	GALLONS PER DAY OR LITERS PER DAY

UNIT OF MEASURE	UNIT OF MEASURE CODE
GALLONS	G
LITERS	L
CUBIC YARDS	Y
CUBIC METERS	C
GALLONS PER DAY	U
LITERS PER DAY	V
TONS PER HOUR	D
METRIC TONS PER HOUR	W
GALLONS PER HOUR	E
LITERS PER HOUR	H
ACRE-FEET	A
HECTARE-METER	F
ACRES	B
HECTARES	Q

EXAMPLE FOR COMPLETING ITEM III *(shown in line numbers X-1 and X-2 below):* A facility has two storage tanks, one tank can hold 200 gallons and the other can hold 400 gallons. The facility also has an incinerator that can burn up to 20 gallons per hour.

S: C | DUP | T/A: | C: 1

LINE NUMBER	A. PROCESS CODE (from list above)	B. PROCESS DESIGN CAPACITY 1. AMOUNT (specify)	B. PROCESS DESIGN CAPACITY 2. UNIT OF MEASURE (enter code)	FOR OFFICIAL USE ONLY	LINE NUMBER	A. PROCESS CODE (from list above)	B. PROCESS DESIGN CAPACITY 1. AMOUNT	B. PROCESS DESIGN CAPACITY 2. UNIT OF MEASURE (enter code)	FOR OFFICIAL USE ONLY
X-1	S 0 2	600	G		5				
X-2	T 0 3	20	E		6				
1	S 0 1	55,000	G		7				
					8				
3					9				
4					10				

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Continued from the front.

III. PROCESSES *(continued)*

C. SPACE FOR ADDITIONAL PROCESS CODES OR FOR DESCRIBING OTHER PROCESSES *(code "T04")*. FOR EACH PROCESS ENTERED HERE INCLUDE DESIGN CAPACITY.

IV. DESCRIPTION OF HAZARDOUS WASTES

A. EPA HAZARDOUS WASTE NUMBER – Enter the four–digit number from 40 CFR, Subpart D for each listed hazardous waste you will handle. If you handle hazardous wastes which are not listed in 40 CFR, Subpart D, enter the four–digit number*(s)* from 40 CFR, Subpart C that describes the characteristics and/or the toxic contaminants of those hazardous wastes.

B. ESTIMATED ANNUAL QUANTITY – For each **listed waste** entered in column A estimate the quantity of that waste that will be handled on an annual basis. For each **characteristic** or **toxic contaminant** entered in column A estimate the total annual quantity of all the non–listed waste*(s)* that will be handled which possess that characteristic or contaminant.

C. UNIT OF MEASURE – For each quantity entered in column B enter the unit of measure code. Units of measure which must be used and the appropriate codes are:

ENGLISH UNIT OF MEASURE	CODE	METRIC UNIT OF MEASURE	CODE
POUNDS	P	KILOGRAMS	K
TONS	T	METRIC TONS	M

If facility records use any other unit of measure for quantity, the units of measure must be converted into one of the required units of measure taking into account the appropriate density or specific gravity of the waste.

D. PROCESSES

1. PROCESS CODES:
   For listed hazardous waste: For each **listed** hazardous waste entered in column A select the code*(s)* from the list of process codes contained in Item III to indicate how the waste will be stored, treated, and/or disposed of at the facility.
   For non–listed hazardous wastes: For each characteristic or toxic contaminant entered in column A, select the code*(s)* from the list of process codes contained in Item III to indicate **all** the processes that will be used to store, treat, and/or dispose of all the non–listed hazardous wastes that possess that characteristic or toxic contaminant.
   Note: Four spaces are provided for entering process codes. If more are needed: (1) Enter the first three as described above; (2) Enter "000" in the extreme right box of Item IV-D(1); and (3) Enter in the space provided on page 4, the line number and the additional code*(s)*.

2. PROCESS DESCRIPTION: If a code is not listed for a process that will be used, describe the process in the space provided on the form.

NOTE: HAZARDOUS WASTES DESCRIBED BY MORE THAN ONE EPA HAZARDOUS WASTE NUMBER – Hazardous wastes that can be described by more than one EPA Hazardous Waste Number shall be described on the form as follows:

1. Select one of the EPA Hazardous Waste Numbers and enter it in column A. On the same line complete columns B,C, and D by estimating the total annual quantity of the waste and describing all the processes to be used to treat, store, and/or dispose of the waste.
2. In column A of the next line enter the other EPA Hazardous Waste Number that can be used to describe the waste. In column D(2) on that line enter "included with above" and make no other entries on that line.
3. Repeat step 2 for each other EPA Hazardous Waste Number that can be used to describe the hazardous waste.

EXAMPLE FOR COMPLETING ITEM IV *(shown in line numbers X-1, X-2, X-3, and X-4 below)* – A facility will treat and dispose of an estimated 900 pounds per year of chrome shavings from leather tanning and finishing operation. In addition, the facility will treat and dispose of three non–listed wastes. Two wastes are corrosive only and there will be an estimated 200 pounds per year of each waste. The other waste is corrosive and ignitable and there will be an estimated 100 pounds per year of that waste. Treatment will be in an incinerator and disposal will be in a landfill.

LINE NO.	A. EPA HAZARD. WASTE NO. (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES 1. PROCESS CODES (enter)	D. PROCESSES 2. PROCESS DESCRIPTION (if a code is not entered in D(1))
X-1	K 0 5 4	900	P	T 0 3 D 8 0	
X-2	D 0 0 2	400	P	T 0 3 D 8 0	
X-3	D 0 0 1	100	P	T 0 3 D 8 0	
X-4	D 0 0 2				included with above

NOTE: Photocopy this page before completing if you h[illegible]ore than 26 wastes to list.

Form Approved OMB No. 158-S80004

EPA I.D. NUMBER (enter from page 1)	FOR OFFICIAL USE ONLY
S W I L D 0 0 5 0 7 0 6 5 1 T/A C 1	S W DUP T/A C 2 DUP

V. DESCRIPTION OF HAZARDOUS WASTES (continued)

LINE NO.	A. EPA HAZARD. WASTE NO. (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES 1. PROCESS CODES (enter)	D. PROCESSES 2. PROCESS DESCRIPTION (if a code is not entered in D(1))
1	F001	1,374	P	S01	
2	~~F017~~	~~160,352~~	P	N/A	Delisted
3	~~F018~~	~~427,284~~	P	N/A	"
4	U226	1,833	P	S01	
5	U239	1,833	P	S01	
6	K062	27,000	P	S01	
7					
8					
9					
10					
11					
12					
13					
14					
15					
16					
17					
18					
19					
20					
21					
22					
23					
24					
25					
26					

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CONTINUE ON REVERSE

(enter "A", "B", "C", etc. behind the "3" to identify photocopied pages)

Continued from the front.

IV. DESCRIPTION OF HAZARDOUS W[illegible]TES *(continued)*

E. USE THIS SPACE TO LIST ADDITIO[illegible]AL PROCESS CODES FROM ITEM D(1) ON PAGE 3.

EPA I.D. NO. *(enter from page 1)*

													T/A	C
F	I	L	D	0	0	5	0	7	0	6	5	1		6

V. FACILITY DRAWING

All **existing** facilities must include in the space provided on page 5 a scale drawing of the facility *(see instructions for more detail).*

VI. PHOTOGRAPHS

All existing facilities must include photographs *(aerial or ground—level)* that clearly delineate all existing structures; existing storage, treatment and disposal areas; and sites of future storage, treatment or disposal areas *(see instructions for more detail).*

VII. FACILITY GEOGRAPHIC LOCATION

LATITUDE *(degrees, minutes, & seconds)*	LONGITUDE *(degrees, minutes, & seconds)*
41° 43' 00 1" North	88° 21' 03 3" West

VIII. FACILITY OWNER

[x] A. If the facility owner is also the facility operator as listed in Section VIII on Form 1, "General Information", place an "X" in the box to the left and skip to Section IX below.

B. If the facility owner is not the facility operator as listed in Section VIII on Form 1, complete the following items:

1. NAME OF FACILITY'S LEGAL OWNER	2. PHONE NO. *(area code & no.)*
E	

3. STREET OR P.O. BOX	4. CITY OR TOWN	5. ST.	6. ZIP CODE
F	G		

IX. OWNER CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME *(print or type)*	B. SIGNATURE	C. DATE SIGNED
Donald F. Domnick	D F Domnick	Sept 12, 1980

X. OPERATOR CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME *(print or type)*	B. SIGNATURE	C. DATE SIGNED
Donald F. Domnick	D F Domnick	Sept 12, 1980

ILD005070651

8

X. EXISTING ENVIRONMENTAL PERMITS

Listed below are our current Operating Permits issued by the State of Illinois. All are for air pollution control. We are not required by IEPA to have a permit for waste water discharge.

Identity No.	Title
03020351	Boilers 1, 2, 3 Coal Fired
08030089	Boilers 2, 3 Oil Fired
03021182	Boilers 4, 5 Gas Fired
05070115	Boilers 7, 8 Gas Fired
02121138	Paint Booths 292, 927, 1884, 3005
03120150	Paint Booth 3302
09050047	Paint Booth 4222
09120029	Paint Booth 4703
080060042	Paint Booth 1332
03021527	Gasoline Storage 1
07050057	Gasoline Storage 2
03021544	Heat Treat Equipment
03030787	Woodworking
03030786	Grinding
03030785	Shot Blast
093807AAB	Air Pollution Episode Action Plan

The following is our current Construction Permit issued by the State of Illinois:

Identity No.	Title
I 804005	Incinerator/Boilers 9, 10

The following Special Waste Permits are issued by the State of Illinois:

Identity No.	Title
790180	API Separator Sludge
782428	Paint Sludge in Drums

UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY
REGION V
230 SOUTH DEARBORN ST.
CHICAGO, ILLINOIS 60604

REPLY TO ATTENTION OF:

RCRA ACTIVITIES

16 OCT 1981

Caterpillar Tractor
Madelene Barnett, Haz. Mat. Coordinator
P.O. Box 348
Aurora, IL 60507

RE: Hazardous Waste Permit Application-Incomplete Part A (ILD005070651)
Facility Name (and EPA ID number)
Facility Address

We have completed our review of your Part A RCRA permit application for the facility referenced above. The application was incomplete; therefore, we are returning it to you along with a checklist which indicates the missing items. Please complete all missing items marked with an asterisk (*) on the application form, and return the form in time to reach this office by November 16, 1981. All other missing items marked on the checklist should be completed and may be forwarded to this office under separate cover by December 16, 1981.

All of these items are necessary in order for the U.S. Environmental Protection Agency to determine whether your facility qualifies for interim status. Once you receive interim status, your facility may continue operating under the interim status standards until such time as a Part B application is requested by USEPA. At that time, you will have up to six months to submit the Part B portion of the application and to show that you comply with the final detail technical standards.

Please note that some of your original entries on the forms may be changed. We have coded your forms to accommodate key punching for subsequent computer processing; all of our coding was done in blue ink only.

If you have any questions or wish to discuss the missing items on the checklist, please feel free to contact Uylaine Banahene, the reviewer of your application, at (312) 886-3718 or me at (312) 886-7449.

Sincerely yours,

Arthur S. Kawatachi

Arthur S. Kawatachi
Regional Project Officer

Enclosure

P.S. All missing items marked with an asterisk must be submitted to us with a cover letter signed by the appropriate certifying official (Item XIII on Form 1 and/or Item IX and X on Form 3) or his duly authorized representative.

PS Form 3811, Jan. 1979

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

● SENDER: Complete items 1, 2, and 3.
Add your address in the "RETURN TO" space on reverse.

1. The following service is requested (check one.)
- ☐ Show to whom and date delivered..... ¢
- ☐ Show to whom, date and address of delivery.... ¢
- ☐ RESTRICTED DELIVERY
  Show to whom and date delivered..... ¢
- ☐ RESTRICTED DELIVERY.
  Show to whom, date, and address of delivery.$ ____

(CONSULT POSTMASTER FOR FEES)

2. ARTICLE ADDRESSED TO:

Madelene Barnett
P.O. Box 348
Aurora, IL 60507

3. ARTICLE DESCRIPTION:

REGISTERED NO.	CERTIFIED NO.	INSURED NO.
	313583	

(Always obtain signature of addressee or agent)

I have received the article described above.

SIGNATURE ☐Addressee ☑Authorized agent

Tom Lind

4. DATE OF DELIVERY

POSTMARK

AURORA, IL
OCT 23
1979
USPO

5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE:

CLERK'S INITIALS

☆GPO: 1979-288-848

Illinois Environmental Protection Agency · 2200 Churchill Road, Springfield, IL 62706

217/782-6761

Refer to: 0938070002 -- Kendall County
Caterpillar, Inc.
ILD005070651
RCRA - Permits

May 6, 1988

Caterpillar, Inc.
Route 34
Montgomery, Illinois 60538

Attn: Environmental Coordinator or
Plant Manager

Dear Sir:

According to Agency files, your facility currently manages hazardous waste in containers and/or tanks subject to the requirements of 35 IAC 700-725. 35 IAC 703.157(f) states that interim status for any hazardous waste storage or treatment facility will be terminated November 8, 1992, unless the facility submits Part B of the RCRA permit application for these units to this Agency by November 8, 1988. This letter is written to (1) make you aware of this requirement and (2) describe the actions which must be taken in response to this requirement.

According to 35 IAC 703.157(f), if an existing facility desires to (1) store hazardous waste on-site for greater than ninety (90) days, (2) treat hazardous waste, or (3) store hazardous waste as a commercial facility after November 8, 1992, it must submit Part B of the RCRA permit application to this Agency by November 8, 1988. The information which must be contained in this application is described in 35 IAC 703, Subpart B. The enclosed document, entitled "RCRA Permit Guidance" provides more detail regarding the necessary contents of the application and also identifies several guidance documents which will be useful in developing the application. Also included in this document is the form which must be used when submitting the application.

If a facility does not desire to continue storing and/or treating hazardous waste after November 8, 1992, it must close the storage and/or treatment unit(s) present at the facility prior to this date. Closure, in this instance, basically means that all contamination must be removed from the unit(s) and if necessary, from the area surrounding these units. The requirements which must be met in closing these units are contained in 35 IAC 725, Subpart G. For you convenience, guidance for the development of a closure plan is contained in the enclosed document entitled "Instructions for the Preparation of Closure Plans for Interim Status RCRA Hazardous Waste Facilities." PLEASE NOTE THAT A CLOSURE PLAN DOES NOT NEED TO BE SUBMITTED AT THIS TIME. IT MUST HOWEVER, BE SUBMITTED TO THE AGENCY NO LATER THAN MAY 8, 1992.

In some instances, there may be several interim status hazardous waste management units at a facility. The facility may desire to pursue a final RCRA permit for a portion of these units and close the rest of them. Because of the uncertainty associated with this option, all interim status units at a facility must be included in Part B of the RCRA permit application, unless a closure plan for the units being closed is submitted with the Part B. If a closure plan is submitted with the Part B, the application need only address those units which will remain in operation.

The only alternatives available for hazardous waste treatment and storage facilities to meet the requirements of 35 IAC 703.157(f) are (1) submit Part B of the RCRA permit application by November 8, 1988 or (2) close by November 8, 1992. However, some facilities may have previously filed Part A of the RCRA permit application in error and now feel that the hazardous waste management activities carried out at the facility do not require a RCRA permit (i.e. the Part A was filed for protective measures). If this is the case, the Agency requests that information supporting this position be submitted no later than November 8, 1988. The Agency can then review the information submitted and correct its records accordingly. The information which must be submitted to make this demonstration is contained in the enclosed document entitled "Facility Part A Withdrawal Request Form."

Finally, some facilities may have closed or are currently closing in accordance with an IEPA approved closure plan. (Please bear in mind this letter is going out to over 200 facilities; some closed facilities may inadvertently receive this letter.) In this instance, the Agency requests that a copy of (1) the closure plan approval letter and (2) the letter from the Agency accepting the certifications of the owner/operator and the registered professional engineer that closure was carried out in accordance with the approved closure plan (if closure has been completed) be submitted by November 8, 1988. The Agency will again be able to review this information and correct its records accordingly.

Because of the large number of facilities subject to the requirements of 35 IAC 703.157(f), the Agency requests that all facilities receiving this letter complete the enclosed form entitled "RCRA Permit Information Form." The form has been developed such that it can be used by a facility falling into any of the five categories described above (pursuing a final permit, planning to close, pursuing a permit for only a portion of the interim status units and closing the other units, protective filers, closed in accordance with an IEPA approved closure plan). This form must be submitted to the Agency no later than November 8, 1988, along with all required attachments. Failure to do so may subject a facility to enforcement under State and/or Federal regulations and possible monetary penalties up to $25,000 per day of noncompliance.

The RCRA Permit Information Form and all required attachments must be submitted in triplicate (original and two (2) copies) to the following address:

Permit Section, RCRA Unit
Division of Land Pollution Control
Illinois Environmental Protection Agency
2200 Churchill Road
P.O. Box 19276
Springfield, IL 62794-9276

If you have any questions regarding this letter, please contact Jim Moore at 217/782-9875.

Very truly yours,

Lawrence W. Eastep, P.E., Manager
Permit Section
Division of Land Pollution Control

LWE:JRM:rd1313j/1314j

Enclosures

cc: Division File
Compliance
Maywood Region
USEPA Region V

C.2 Compliance/ Enforcement

5EWHME

MAY 2 0 1981

Ms. Madelene Barnett
Hazardous Materials Coordinator
c/o Plant Engineering Division
Caterpillar Tractor Company
P.O. Box 348
Aurora, Illinois 60507

Re: Caterpillar Tractor Company
Aurora, Illinois ILD005070651

Dear Ms. Barnett:

Enclosed please find a copy of the report of the inspection dated March 16, 1981, conducted at the above facility by a representative of the Illinois Environmental Protection Agency (IEPA). The purpose of the inspection was to determine your facility's compliance status with the Resource Conservation and Recovery Act (RCRA) as amended by the Quiet Communities Act of 1978. We are pleased to report that your facility was found to be in compliance.

Your cooperation and efforts in this matter are appreciated. Should you have any questions about the report, please contact Mr. Phil Kaplan at (312) 353-2114.

Very truly yours,

Arnold E. Leder, Chief
Compliance Section
Water & Hazardous Materials
Enforcement Branch

Enclosure

cc: Jack Moore, Manager
Division of Land/Noise Pollution Control
Illinois Environmental Protection Agency

bcc: Constantelos/Klepitsch
Stone
Baumgartner/Lewis
Kaplan
Brad Benning-IEPA, Maywood

PKaplan/ng 5-12-81/5-15-81 6-6715

Gingher M.M. 5-15-81
Kaplan PK 5-18-81
Baumgartner ____
Donaldson Ad
Leder ____

04380702
STATE IDENTIFICATION NUMBER
(If Applicable)

IL0005070651
EPA IDENTIFICATION NUMBER

RECEIVED
MAR 23 1981
E.P.A. — D.L.P.C.
STATE OF ILLINOIS

RCRA INSPECTION REPORT - INTERIM STATUS STANDARDS
TREATMENT, STORAGE, AND DISPOSAL FACILITIES
Form A - General Facility Standards

RECEIVED
APR 1 1981
WASTE MANAGEMENT BRANCH
EPA, REGION V

I. General Information:

(A) Facility Name: CATERPILLAR TRACTOR Co.

(B) Street: Rt ~~34~~ 31

(C) City: Aurora (D) State: ILL. (E) Zip Code: 60507

(F) Phone: 312/859-4716 (G) County: Kendall

(H) Operator: - Same -

(I) Street:

(J) City: (K) State: (L) Zip Code

(M) Phone: (N) County:

(O) Owner: - Same -

(P) Street:

(Q) City: (R) State: (S) Zip Code:

(T) Phone: (U) County:

(V) Date of Inspection: 3-16-81 (W) Time of Inspection (From) 10:00 AM (To) 12:00 AM

(X) Weather Conditions: 30° Sunny

Rev. 3-6-81/J.B.

	Person(s) Interviewed	Title	Telephone
(Y)	Barnett, Madelene	Haz. Mat. Coord.	312/859-4716

	Inspection Participants	Agency/Title	Telephone
(Z)	Brad Benning	IEPA/Env. Prot. Sp.	345-9780

(AA) Preparer Information

Name	Agency/Title	Telephone
Brad Benning	IEPA/Env. Prot. Sp	345-9780

II. SITE ACTIVITY:

Complete sections I through VII for all treatment, storage, and/or disposal facilities. Complete the forms (in parenthesis) in section VIII corresponding to the site activities identified below:

X A. Storage and/or Treatment
   1. Containers (I)
   2. Tanks (J)
   3. Surface Impoundments (K)
   4. Waste Piles (L)

___ B. Land Treatment (M)

___ C. Landfills (N)

___ D. Incineration and/or Thermal Treatment (O and P)

___ E. Chemical, Physical, and Biological Treatment (Q)

Note: If facility is also a generator or transporter of hazardous waste complete sections IX and X of this form as appropriate.

II. GENERAL FACILITY STANDARD
(Part 265 Subpart B)

	Yes	No	NI*	Remark
(A) Has the Regional Administrator been notified regarding:				
1. Receipt of hazardous waste from a foreign source?			✓	No Foreign Waste
2. Facility expansion?			✓	No expansion
(B) General Waste Analysis:				
1. Has the owner or operator obtained a detailed chemical and physical analysis of the waste?	X			
2. Does the owner or operator have a detailed waste analysis plan on file at the facility?	X			
3. Does the waste analysis plan specify procedures for inspection and analysis of each movement of hazardous waste from off-site?	X			
(C) Security - Do security measures include: (if applicable)				
1. 24-Hour surveillance?	X			
2. Artificial or natural barrier around facility?	X			
3. Controlled entry?	X			
4. Danger sign(s) at entrance?	X			
(D) Do Owner or Operator Inspections Include:				
1. Records of malfunctions?	X			
2. Records of operator error?	X			
3. Records of discharges?	X			

*Not Inspected

	Yes	No	NI*	Remarks
4. Inspection schedule?	X	---	---	----------
5. Safety, emergency equipment?	X	---	---	----------
6. Security devices?	X	---	---	----------
7. Operating and structural devices?	X	---	---	----------
8. Inspection log?	X	---	---	----------
(E) Do personnel training records include: (Effective 5/19/81)				
1. Job titles?	X	---	---	----------
2. Job descriptions?	X	---	---	----------
3. Description of training?	X	---	---	----------
4. Records of training?	X	---	---	----------
5. Have facility personnel received required training by 5-19-81?	X	---	---	----------
6. Do new personnel receive required training within six months?	X	---	---	----------
(F) If required are the following special requirements for ignitable, reactive, or incompatible wastes addressed?				
1. Special handling?	X	---	---	----------
2. No smoking signs?	X	---	---	----------
3. Separation and protection from ignition sources?	X	---	---	----------

*Not Inspected

IV. PREPAREDNESS AND PREVENTION:
(Part 265 Subpart C)

	Yes	No	NI*	Remarks
(A) Maintenance and Operation of Facility: Is there any evidence of fire, explosion, or release of hazardous waste or hazardous waste constituent?	___	X	___	
(B) If required, does the facility have the following equipment:				
1. Internal communications or alarm systems?	X	___	___	
2. Telephone or 2-way radios at the scene of operations?	X	___	___	
3. Portable fire extinguishers, fire control, spill control equipment and decontamination equipment?	X	___	___	

Indicate the volume of water and/or foam available for fire control:

3 Wells located on property

(C) Testing and Maintenance of Emergency Equipment:				
1. Has the owner or operator established testing and maintenance procedures for emergency equipment?	X	___	___	
2. Is emergency equipment maintained in operable conditions?	X	___	___	
(D) Has owner or operator provided immediate access to internal alarms? (if needed)	X	___	___	

*Not Inspected

(E) Is there adequate aisle space for unobstructed movement? X ___ ___ _____

V. CONTINGENCY PLAN AND EMERGENCY PROCEDURES: (Part 265 Subpart D)

(A) Does the Contingency Plan contain the following information:	Yes	No	NI*	Remarks
1. The actions facility personnel must take to comply with §265.51 and 265.56 in response to fires, explosions, or any unplanned release of hazardous waste? (If the owner has a Spill Prevention, Control, and Countermeasures (SPCC) Plan, he needs only to amend that plan to incorporate hazardous waste management provisions that are sufficient to comply with the requirements of this Part (as applicable.)	X			
2. Arrangements agreed by local police departments, fire departments hospitals, contractors, and State and local emergency response teams to coordinate emergency services pursuant to §265.37?	X			
3. Names, addresses, and phone numbers (office and home) of all persons qualified to act as emergency coordinators?	X			
4. A list of all emergency equipment at the facility which includes the location and physical description of each item on the list and a brief outline of its capabilities?	X			
5. An evacuation plan for facility personnel where there is a possibility that evacuation could be necessary? (This plan must describe signal(s) to be used to begin evacuation, evacuation routes, and alternate evacuation routes?)	X			

*Not Inspected

	Yes	No	NI*	Remarks
(B) Are copies of the Contingency Plan available at site and local emergency organizations?	X			
(C) Emergency Coordinator				
1. Is the facility Emergency Coordinator identified?	X			
2. Is coordinator familiar with all aspects of site operation and emergency procedures?	X			
3. Does the Emergency Coordinator have the authority to carry out the Contingency Plan?	X			
(D) Emergency Procedures				
If an emergency situation has occurred at this facility, has the Emergency Coordinator followed the emergency procedures listed in 265.56?			X	No Emergencies

VI. MANIFEST SYSTEM, RECORDKEEPING, AND REPORTING
(Part 265 Subpart E)

	Yes	No	NI*	Remarks
(A) Use of Manifest System				
1. Does the facility follow the procedures listed in §265.71 for processing each manifest?	X			
2. Are records of past shipments retained for 3 years?	X			
(B) Does the owner or operator meet requirements regarding manifest discrepancies?	X			

*Not Inspected

(C) Operating Record

1.	Does the owner or operator maintain an operating record as required in 265.73?	X			
2.	Does the operating record contain the following information:				
**b.	The method(s) and date(s) of each waste's treatment, storage, or disposal as required in Appendix I?	X			
c.	The location and quantity of each hazardous waste within the facility?	X			
***d.	A map or diagram of each cell or disposal area showing the location and quantity of each hazardous waste? (This information should be cross-referenced to specific manifest number, if waste was accompanied by a manifest.)			X	No Disposal
e.	Records and results of all waste analyses, trial tests, monitoring data, and operator inspections?	X			
f.	Reports detailing all incidents that required implementation of the Contingency Plan?	X			
g.	All closure and post closure costs as applicable? (Effective 5-19-81)	X			

** See page 33252 of the May 19, 1980, Federal Register.

*** Only applies to disposal facilities

*Not Inspected

VII. CLOSURE AND POST CLOSURE
(Part 265 Subpart G)

	Yes	No	NI*	Remarks
(A) Closure and Post Closure				
1. Is the facility closure plan available for inspection by May 19, 1981?	X			
2. Has this plan been submitted to the Regional Administrator		X		
3. Has closure begun?		X		
4. Is closure estimate available by May 19, 1981?	X			
(B) Post closure care and use of property				
Has the owner or operator supplied a post closure monitoring plan? (effective by May 19, 1981)			X	

VIII. FACILITY STANDARDS
(Part 265, Subparts I thru R)

I
USE AND MANAGEMENT OF CONTAINERS

Facility Name: Caterpillar Tractor Date of Inspection: 3-16-81

	Yes	No	NI*	Remarks
1. Are containers in good condition?	X			
2. Are containers compatible with waste in them?	X			
3. Are containers stored closed?	X			
4. Are containers managed to prevent leaks?	X			
5. Are containers inspected weekly for leaks and defects?	X			
6. Are ignitable & reactive wastes stored at least 15 meters (50 feet) from the facility property line? (Indicate if waste is ignitable or reactive.)	X			

	Yes	No	NI*	Remarks
7. Are incompatible wastes stored in separate containers? (If not, the provisions of 40 CFR 265.17(b) apply.)	X	---	X	Nothing incompatible
8. Are containers of incompatible waste separated or protected from each other by physical barriers or sufficient distance?	---	---	X	Nothing incompatible

J
TANKS

Facility Name: _____ Date of Inspection: _____

1. Are tanks used to store only those wastes which will not cause corrosion, leakage or premature failure of the tank?	---	---	---	---
2. Do uncovered tanks have at least 60 cm (2 feet) of freeboard, or dikes or other containment structures?	---	---	---	---
3. Do continuous feed systems have a waste-feed cutoff?	---	---	---	---
4. Are waste analyses done before the tanks are used to store a substantially different waste than before?	---	---	---	---
5. Are required daily and weekly inspections done?	---	---	---	---
6. Are reactive & ignitable wastes in tanks protected or rendered non-reactive or non-ignitable? Indicate if waste is ignitable or reactive. (If waste is rendered non-reactive or non-ignitable, see treatment requirements.)	---	---	---	---
7. Are incompatible wastes stored in separate tanks? (If not, the provisions of 40 CFR 265.17(b) apply.)	---	---	---	---

*Not Inspected

	Yes	No	NI*	Remarks

8. Has the owner or operator observed the National Fire Protection Association's buffer zone requirements for tanks containing ignitable or reactive wastes?

   Tank capacity: _____ gallons

   Tank diameter: _____ feet

   Distance of tank from property line _____ feet

   (See table 2 - 1 through 2 - 6 of NFPA's "Flammable and Combustible Liquids Code - 1977" to determine compliance.)

K
SURFACE IMPOUNDMENTS

Facility Name: _____ Date of Inspection: _____

	Yes	No	NI*	Remarks
1. Do surface impoundments have at least 60 cm (2 feet) of freeboard?				
2. Do earthen dikes have protective covers?				
3. Are waste analyses done when the impoundment is used to store a substantially different waste than before?				
4. Is the freeboard level inspected at least daily?				
5. Are the dikes inspected weekly for evidence of leaks or deterioration?				
6. Are reactive & ignitable wastes rendered non-reactive or non-ignitable before storage in a surface impoundment? (If waste is rendered non-reactive or non-ignitable, see treatment requirements.)				
7. Are incompatible wastes stored in different impoundments? (If not, the provisions of 40 CFR 265.17(b) apply.)				

L

WASTE PILES

Facility Name: _____ Date of Inspection: _____

	Yes	No	NI*	Remarks
1. Are waste piles covered or protected from dispersal by wind?	---	---	---	---
2. Is each in-coming movement of waste analyzed before being added to the waste pile?	---	---	---	---
3. Are leachate, run-off, and run-on controlled as per the requirements of 265.258? (The effective date of this provision is Nov. 19, 1981.)	---	---	---	---
4. Are reactive & ignitable wastes rendered non-reactive or non-ignitable before storage in a pile? Indicate if waste is ignitable or reactive. (If waste is rendered non-reactive or non-ignitable, see treatment requirements.)	---	---	---	---
5. Are piles of reactive or ignitable waste protected from materials or conditions that might cause them to ignite or react?	---	---	---	---
6. Are incompatible wastes stored in different piles? (If not, the provisions of 40 CFR 265.17(b) apply.)	---	---	---	---
7. Are piles of imcompatible waste protected by barriers or distance from other waste?	---	---	---	---

*Not Inspected

N
LANDFILLS

Facility Name: _____ Date of Inspection: _____

	Yes	No	NI*	Remarks
(A) General Operating Requirements Does the facility provide the following:				
**1. Diversion of run-on away from active portions of the fill?	---	---	---	---
**2. Collection of run-off from active portions of the fill?	---	---	---	---
**3. Is collected run off treated?	---	---	---	---
4. Control of wind dispersal of hazardous waste?	---	---	---	---
(**Effective 11-19-81)				
(B) Surveying and Recordkeeping Does the Operating Record Include:				
1. A map showing the exact location and dimensions of each cell?	---	---	---	---
2. The contents of each cell and the location of each hazardous waste type withing each cell?	---	---	---	---
(C) Closure and Post-Closure				
1. Is the Closure Plan available for inspection by 5-19-81?	---	---	---	---
2. Has this plan been submitted to the Regional Administrator?	---	---	---	---
3. Has closure begun?	---	---	---	---
4. Is closure cost estimate available by 5-19-81?	---	---	---	---
(D) Special requirements for ignitable or reactive waste				
Are ignitable or reactive waste treated so the resulting mixture is no longer ignitable or reactive?	___	___	___	___

N
LANDFILLS

Facility Name: _____ Date of Inspection: _____

	Yes	No	NI*	Remarks
(A) General Operating Requirements Does the facility provide the following:				
**1. Diversion of run-on away from active portions of the fill?	---	---	---	---
**2. Collection of run-off from active portions of the fill?	---	---	---	---
**3. Is collected run off treated?	---	---	---	---
4. Control of wind dispersal of hazardous waste?	---	---	---	---
(**Effective 11-19-81)				
(B) Surveying and Recordkeeping Does the Operating Record Include:				
1. A map showing the exact location and dimensions of each cell?	---	---	---	---
2. The contents of each cell and the location of each hazardous waste type withing each cell?	---	---	---	---
(C) Closure and Post-Closure				
1. Is the Closure Plan available for inspection by 5-19-81?	---	---	---	---
2. Has this plan been submitted to the Regional Administrator?	---	---	---	---
3. Has closure begun?	---	---	---	---
4. Is closure cost estimate available by 5-19-81?	---	---	---	---
(D) Special requirements for ignitable or reactive waste				
Are ignitable or reactive waste treated so the resulting mixture is no longer ignitable or reactive?	___	___	___	_____

	Yes	No	NI*	Remarks
(If waste is rendered non-reactive or non-ignitable see treatment requirements)				
If not, the provisions of 40 CFR 265.17(b) apply.	___	___	___	_____
(E) Special Requirements for Incompatible Wastes.				
Does the owner or operator dispose of incompatible wastes in separate cells?	___	___	___	_____
If not, the provisions of 40 CFR 265.17(b) apply.	___	___	___	_____
(F) Special requirements for liquid waste (effective 11-19-81)				
1. Are bulk or non-containerized liquids placed in the landfill?	___	___	___	_____
2. Does the landfill have a chemically and physically resistant liner system?	___	___	___	_____
3. Does the landfill have a functional leachate collection system?	___	___	___	_____
4. Are free liquids stabilized prior to or immediately after placement in the landfill?	___	___	___	_____
(G) Special requirements for Containers (effective 11-19-81)				
Are empty containers crushed flat, shredded, or similarly reduced in volume before being buried beneath the surface of the landfill?	___	___	___	_____

*Not Inspected

O and P
INCINERATION and THERMAL TREATMENT

(A) Facility Name: _____

(B) Date of Inspection: _____

I. Determination of Steady State

A. Type of unit (i.e., type of incinerator or thermal treatment): _____

_____

B. Components and steady state condition:

**** Was this component at SS prior to adding waste?

	Component	Yes	No	NI*	Remarks
1.	_____	___	___	___	_____
2.	_____	___	___	___	_____
3.	_____	___	___	___	_____
4.	_____	___	___	___	_____
5.	_____	___	___	___	_____

II. Waste Analysis

A. Minimum requirements, for wastes not previously burned/treated.

	1. Required analyses; has an analysis been performed for the following?	Yes	No	NI*	Remarks
a.	Heating value	___	___	___	_____
b.	Halogen content	___	___	___	_____
c.	Sulfur content	___	___	___	_____

*Not Inspected

	Yes	No	NI	Remarks
2. Has documented or written data been substituted for analysis of either:				
a. Lead?	___	___	___	_____
b. Mercury?	___	___	___	_____

B. List other parameters for which the waste is tested to enable owner or operator to establis steady state or determine the types of pollutants which may be emitted. (Note in Remarks any which you feel should be tested.)

	Remarks
1. _____	_____
2. _____	_____
3. _____	_____
4. _____	_____
5. _____	_____

III. Monitoring and Inspections

	Yes	No	NI*	Remarks
A. Are combustion/emission control instruments monitored at least every 15 minutes?	___	___	___	_____
B. Is steady state maintained or corrections attempted?	___	___	___	_____
C. Is stack plume observed at least hourly for normal color and opacity?	___	___	___	_____
D. Did any stack observations made by owner or operator show a plume different than normal?**	___	___	___	_____
E. If yes to D above, were corrections made to return emissions to normal appearance?**	___	___	___	_____
F. Are the complete unit and associated equipment inspected daily for leaks, spills, and fugitive emissions?	___	___	___	_____
G. Are emergency shutdown controls and system alarms checked daily for proper operation?	___	___	___	_____

*Not Inspected
**Specify in Remarks for what period of time this was checked.

IV. Open Burning

A. Only complete this part if the facility open burns hazardous waste.

	Yes	No	NI*	Remarks
1. Does this facility burn only waste explosives? (A No answer means other hazardous waste is open-burned.)	___	___	___	_____
2. If this facility open-burns waste explosives, does it burn the waste at a distance greater than or equal to the minimum specified distance (below)	___	___	___	_____

Pounds of waste explosives or propellants	Minimum distance from open burning or detonation to the property of others	
0 to 100.....	204 m	670 ft
101 to 1,000.....	380 m	1,250 ft
1,001 to 10,000.....	530 m	1,730 ft
10,0001 to 30,000.....	690 m	2,260 ft

Q

CHEMICAL, PHYSICAL and BIOLOGICAL TREATMENT

Facility Name: _____

Date of Inspection: _____

	Yes	No	NI*	Remarks
1. Is equipment used to treat only those wastes which will not cause leakage, corrosion, or premature failure?	___	___	___	_____
2. Is a continuously fed system equipped with a means of hazardous waste inflow stoppage or control (e.g., cut-off system?)	___	___	___	_____

*Not Inspected

	Yes	No	NI*	Remarks
3. Has the owner or operator addressed the waste analysis requirements of 265.402?	___	___	___	_____
4. Are inspection procedures followed according to 265.403?	___	___	___	_____
5. Are the special requirements fulfilled for ignitable or reactive wastes?	___	___	___	_____
6. Are incompatible wastes treated? (If yes, 265.17(b) applies.)	___	___	___	_____

Note: EPA has temporarily suspended the applicability of the requirements of the hazardous waste regulations in 40 CFR Parts 122, 264 and 265 to owners and operators of (1) wastewater treatment tanks that receive, store, and treat wastewaters that are hazardous waste or that generate, store or treat a wastewater treatment sludge which is a hazardous waste where such wastewaters are subject to regulation under Sections 402 or 307(b) of the Clean Water Act (33 U.S.C. 1251 et seq.) and (2) neutralization tanks, transport vehicles, vessels, or containers which neutralize wastes which are hazardous only because they exhibit the corrosivity characteristic under 40 CFR §261.22 or are listed as hazardous wastes in Subpart D of 40 CFR Part 261 only for this reason.

IX

Complete this section if the owner or operator of a TSD facility also generates hazardous waste that is subsequently shipped off-site for treatment, storage, or disposal.

1. MANIFEST REQUIREMENTS

	Yes	No	NI*	Remarks
(A) Does the operator have copies of the manifest available for review?	X	___	___	_____
(B) Do the manifest forms reviewed contain the following information: (If possible, make copies of, or record information from, manifest(s) that do not contain the critical elements)				
1. Manifest document number?	X	___	___	_____
2. Name, mailing address, telephone number, and EPA ID Number of Generator	X	___	___	_____

		Yes	No	NI*	Remarks
3.	Name and EPA ID Number of Transporter(s)?	X			
4.	Name, address, and EPA ID Number of Designated permitted facility and alternate facility?	X			
5.	The description of the waste(s) (DOT shipping name, DOT hazard class, DOT identification number)?	X			
6.	The total quantity of waste(s) and the type and number of containers loaded?	X			
7.	Required certification?	X			
8.	Required signatures?	X			
(C)	Does the owner or operator submit exception reports when needed?	X			

2. PRE-TRANSPORT REQUIREMENTS

(A)	Is waste packaged in accordance with DOT Regulations? (Required prior to movement of hazardous waste off-site)	X			
(B)	Are waste packages marked and labeled in accordance with DOT regulations concerning hazardous waste materials? (Required to movement of hazardous waste off-site)	X			
(C)	If required, are placards available to transporters of hazardous waste?	X			

Omit Section 3 if the facility has interim status and its Part A permit application describes storage

3. On Site Accumulation

	Yes	No	NI*	Remarks
1. Are containers marked with start of accumulation date?	___	___	___	_____
2. Are the containers of hazardous waste removed from installation before they can accumulate for more than 90 days?	___	___	___	_____
3. Are wastes stored in containers managed in accordance with 40 CFR Part 265.174 and 265.176 (weekly inspections of containers, containers holding ignitable or reactive wastes located at least 15 meters (50 Feet) from facility's property line?	___	___	___	_____
4. If wastes are stored in tanks, are the tanks managed according to the following requirements?				
a. Are tanks used to store only those wastes which will not cause corrosion leakage or premature failure of the tank?	___	___	___	_____
b. Do uncovered tanks have at least 60 cm (2 feet) of freeboard, dikes, or other containment structures?	___	___	___	_____
c. Do continuous feed systems have a waste-feed cutoff?	___	___	___	_____
d. Are required daily and weekly inspections done?	___	___	___	_____
e. Are reactive & ignitable wastes in tanks protected or rendered non-reactive or non-ignitable? (If waste is rendered non-reactive or non-ignitable, see treatment requirements?	___	___	___	_____
f. Are incompatible wastes stored in separate tanks? (If not, the provisions of 40 CFR §265.17(b) apply)	___	___	___	_____

*Not Inspected

VI. RECORDKEEPING and REPORTING
(Part 262, Subpart D)

	Yes	No	NI*	Remarks
(A) Are Manifests, Annual Reports, Exception Reports, and all test results and analyses retained for at least three years?	X			
(B) Has the generator submitted Annual Reports and Exception Reports as required?	X			

VII. INTERNATIONAL SHIPMENTS
(Part 262, Subpart E)

	Yes	No	NI*	Remarks
Has the installation imported or exported Hazardous Waste?		X		

(If answered Yes, complete the following as applicable.)

	Yes	No	NI*	Remarks
1. Exporting Hazardous waste, has a generator:				
a. Notified the Administrator in writing?				
b. Obtained the signature of the foreign consignee confirming delivery of the waste(s) in the foreign country?				
c. Met the Manifest requirements?				
2. Importing Hazardous Waste, has the generator:				
Met the manifest requirements?				

*Not Inspected

X

TRANSPORTER REQUIREMENTS
40 CFR Part 263

Complete this Section if the owner or operator transports hazardous waste.

I. MANIFEST SYSTEM AND RECORDKEEPING
(Subpart B)

	Yes	No	NI*	Remarks
Are copies of the completed manifests or shipping paper(s) available for review and retained for three years?	___	___	___	_____

II. INTERNATIOINAL SHIPMENTS

	Yes	No	NI*	Remarks
A. Does the transporter record on the manifest the date the waste left the U.S.?	___	___	___	_____
B. Are signed completed manifest(s) on file?	___	___	___	_____

V. MISCELLANEOUS

	Yes	No	NI*	Remarks
A. Does transporter transport hazardous waste into the U.S. from abroad?	___	___	___	_____
B. Does the transporter mix hazardous waste of different DOT shipping descriptions by placing them into a single container?	___	___	___	_____

NOTE: If (A) or (B) were answered "Yes" then the Transporter is also a Generator and must comply with the Generator regulations.

*Not Inspected

REMARKS

Use this section to briefly describe site activities observed at the time of the inspection. Note any possible violations of Interim Status Standards.

Caterpillar generates and stores the following wastes

F001 Trichloroethane
U226 Methyl Chloroform, 1,1,1-Trichloroethane
U239 Xylene

F017 } Paint residues and sludges (Temporarily Suspended)
F018 }

This material is all stored in drums in their resource recovery area. The drum storage area has a concrete floor which is sloped so that any spillage will collect in a trough and be contained. The drums are catagorized by each specific waste and in-house labels along with the HAZ labels are used. The ILL. Suppl. Permit and manifest system is used for all movement of HAZ. waste off site. Caterpillar was in compliance with all RCRA Standards, for Generator and Storage.

ENVIRONMENT PROTECTION AGENCY STATE OF ILLINOIS

LPCFCO55C
(1) (8) (9)

OBSERVATION REPORT - SITE INVENTORY NO. _____
(11) (18)

_____ CO. - L.P.C. Region # N Date __/__/__
(20) (25)

_____/_____ Letter Sent (Yes or No) _____
(Location) (Responsible Party) (26)

Samples Taken: Yes ( ) No ( ) Time: From __:__ m Weather _____
Ground Water( ) Surface( ) Other( ) To __:__ m
Photos Taken: Yes ( ) No ( ) Interviewed _____ Inspector _____ _____ _____
(27) (29)

Previous Inspection _____ Previous Correspondence _____ Site Open: Yes( ) No( )

OPERATIONAL STATUS:		TYPE OF OPERATION:				AUTHORIZATION:	
Operating	( )	Landfill	( )	Storage	( )	E.P.A. Permit	( )
Temporarily Closed	( )	Random Dump	( )	Salvage	( )	Variance	( )
Closed Not Covered	( )	Other _____	( )	A.C.D.	( )	21(e)	( )
Closed and Covered	( )	Quantity Received Daily(1-6)		_____ (30)		Board Order	( )
						Illegal (5)	( ) _____ (31)

IMPROVED

SAME

DETERIORATED

RECEIVED
MAR 23 1981
E.P.A. — D.L.P.C.
STATE OF ILLINOIS

LPC 4 1/79 5,000

I S or D _____ (62)

GENERAL REMARKS: _____

INTERVIEW: _____

DIAGRAM:

CATERPILLAR TRACTOR CO.

Box 348
Aurora, Illinois 60507

December 18, 1980

Kenneth A. Fenner, Chief
Water & Hazardous Materials Enforcement Branch
USEPA
230 S. Dearborn Street
Chicago, Illinois 60604

Dear Mr. Fenner:

RE: Notice of Violation
Caterpillar Tractor Company
Aurora, Illinois
IL D005070651

The following information is in response to the Notice of Violation received by Caterpillar Tractor Co., Aurora, Illinois, on December 15, 1980.

In order to prevent an improper DOT description we had already instituted the procedure of having the DOT Section of the manifest completed in advance. This section is no longer completed by hand.

Enclosed is a copy of one of our manifests as they are presently being issued.

Sincerely,

John D. Winters

J.D. Winters
Plant Manager

JDW:sb
Enc. 1

CERTIFIED

P13 4477736

MAIL

STATE OF ILLINOIS

TO BE COMPLETED BY WASTE GENERATOR

ENVIRONMENTAL PROTECTION AGENCY
DIVISION OF LAND POLLUTION CONTROL
2200 CHURCHILL ROAD, SPRINGFIELD, ILLINOIS 62706
(217) 782-6760

0243324

Phone: (312) 859-5000

SPECIAL WASTE HAULING MANIFEST

Authorization Number 8 0 1 9 8 4

Caterpillar Tractor Co. (Company Name) | P. O. Box 348 Attn: M. Barnett (Address)

0 8 9 4 0 7 0 0 0 7 G (Generator Number)

Aurora (City) | Il (State) | 60507 (Zip) | EPA I.D. I L D 0 0 5 0 7 0 6 5 1

WASTE HAULER(S)

Chemical Waste Mgt. (Hauler Name) | P.O.Box 1296 Calumet City, Il 60409 (Hauler Address) | S.W.H. Registration Number 0 0 7 5

EPA I.D. I L D 1 8 0 0 1 1 8 5 0

(Hauler Name) | (Hauler Address) | S.W.H. Registration Number

DESTINATION — DISPOSAL STORAGE OR TREATMENT SITE

ESL (Facility Name) | Rt. 1, Box 109 (Address) | 1 9 7 0 4 5 0 2 (Site Number)

Elmwood (City) | Il (State) | 60421 (Zip) | EPA I.D. I L D 0 7 4 4 1 1 7 4 5

TO BE COMPLETED BY WASTE GENERATOR

WASTE NAME: Paint Stripper Material

WASTE PHASE: Liquid (Liquid, Gaseous, Solid)

EPA # F017

THE SPECIAL WASTE BEING TRANSPORTED UNDER THIS MANIFEST IS OF THE DOT HAZARD CLASSIFICATION INDICATED IMMEDIATELY BELOW:

SHIPPING DESCRIPTION:	HAZARD CLASS:
Hazardous Waste, Liquid	ORM-E
n.o.s.	

WEIGHT FOR D.O.T. USE _____ LBS TONS (circle one)

IT FOR I.E.P.A. USE MUST BE CONVERTED TO CU. YDS. OR GAL.

QUANTITY OF WASTE DELIVERED: _____

1 GALLONS (Circle One)
2 CU. YDS.

METHOD OF SHIPMENT (Circle One) DRUMS TANK TRUCK OPEN TRUCK OTHER (Specify) _____

THIS IS TO CERTIFY THAT THE ABOVE-NAMED ~~SPECIAL~~ hazardous WASTE IS PROPERLY CLASSIFIED, DESCRIBED, PACKAGED, MARKED, AND LABELED AND IS IN PROPER CONDITION FOR TRANSPORTATION, IN ACCORDANCE WITH THE APPLICABLE REGULATIONS OF THE DEPARTMENT OF TRANSPORTATION, and the EPA.

I HEREBY AGREE TO AND CERTIFY THE ABOVE WRITTEN INFORMATION

DATE: _____ (Authorized Signature)

WASTE HAULER

I HEREBY CERTIFY THAT THE ABOVE-DESCRIBED SPECIAL WASTE AND QUANTITY HAS BEEN ACCEPTED IN PROPER CONDITION FOR TRANSPORT AND I ACKNOWLEDGE THE DESTINATION AS INDICATED:

(1) _____ (Authorized Signature) DATE: _____

(2) _____ (Authorized Signature) DATE: _____

DISPOSAL, STORAGE, OR TREATMENT FACILITY*

HAZARDOUS WASTE SUBJECT TO FEE YES_____ NO_____

I HEREBY CERTIFY THAT THE ABOVE-DESCRIBED SPECIAL WASTE AND INDICATED QUANTITY HAS BEEN ACCEPTED AT THE SITE SPECIFIED ABOVE:

_____ (Authorized Signature) DATE: _____

COMMENTS OR SPECIAL INSTRUCTIONS: _____

IN ILLINOIS: 217 / 782-3637 ***24 HOUR EMERGENCY AND SPILL ASSISTANCE NUMBERS*** OUTSIDE ILLINOIS: 800 / 424-8802

DISTRIBUTION: PART - 1 GENERATOR PART - 2 IEPA PART - 3 SITE PART - 4 HAULER PART - 5 IEPA PART - 6 GENERATOR

GENERATOR COPY — PART 1 - DO NOT REMOVE PART 1 FROM SET UNTIL COMPLETED.

DEC 11 1980

5EWHME

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

John Winters, Plant Manager
Caterpiller Tractor Company
P.O. Box 348
Aurora, Illinois 60507

RE: NOTICE OF VIOLATION
Caterpillar Tractor Company
Aurora, Illinois
IL D005070651

Dear Mr. Winters:

Notice is hereby given that the United States Environmental Protection Agency (U.S. EPA) has determined that your facility has violated requirements of Subtitle C of the Resource Conservation and Recovery Act (RCRA) as amended by the Quiet Communities Act of 1978. Specifically, it has been determined that Caterpillar Tractor Company has violated Section 3002 of RCRA, (42 U.S. 6922).

On November 20, 1980, representatives of the Illinois State Police and U.S. EPA conducted a hazardous waste transporter inspection on a vehicle of Chemical Waste Management of Illinois, a hazardous waste transporter operating from Calumet City, Illinois. The inspection, conducted at the Frankfort, Illinois weigh station, revealed that the vehicle was transporting hazardous wastes generated at your facility. The manifest accompanying the wastes, Illinois Special Waste Hauling Manifest (document number 0243031), was deficient in that the description of hazardous waste did not include the Department of Transportation proper shipping name. As required by Section 3002 of RCRA, the generator of the hazardous waste is responsible for insuring that this item is on the manifest.

Within 15 days of the date of this Notice, a report describing steps that have been taken to correct this deficiency should be submitted to the Chief, Compliance Section, Water and Hazardous Materials Enforcement Branch, U.S. EPA, 230 South Dearborn Street, Chicago, Illinois 60604. Failure to correct the above deficiencies may result in further enforcement action pursuant to 42 U.S.C. 6928. This information is requested pursuant to 42 U.S.C. 6927. Should you have any questions in this matter, please contact Mr. Michael Mott of my staff at (312) 353-2114.

Very truly yours,

Called and left message for Hak Cho 12/11/80 that NOV was being issued

Kenneth A. Fenner, Chief
Water & Hazardous Materials Enforcement Branch

5EWHME

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

John Winters, Plant Manager
Caterpiller Tractor Company
P.O. Box 348
Aurora, Illinois 60507

RE: NOTICE OF VIOLATION
Caterpillar Tractor Company
Aurora, Illinois
IL D005070651

Dear Mr. Winters:

Notice is hereby given that the United States Environmental Protection Agency (U.S.EPA) has determined that your facility has violated requirements of Subtitle C of the Resource Conservation and Recovery Act (RCRA) as amended by the Quiet Communities Act of 1978. Specifically, it has been determined that Caterpillar Tractor Company has violated Section 3002 of RCRA, (42 U.S. 6922).

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Within 15 days of the date of this Notice , a report describing steps that have been taken to correct this deficiency should be submitted to the Chief, Compliance Section, Water and Hazardus Materials Enforcement Branch, U.S. EPA, 230 South Dearborn Street, Chicago, Illinois 60604. Failure to correct the above deficiencies may result in further enforcement action pursuant to 42 U.S.C. 6928. This information is requested pursuant to 42 U.S.C. 6927. Should you have any questions in this matter, please contact Mr. Michael Mott of my staff at (312) 353-2114.

Very truly yours,

Kenneth A. Fenner, Chief
Water & Hazardous Materials Enforcement Branch

cc: Michael P. Mauzy, Director
Illinois Environmental Protection Agency

bcc: Constantelos
Goldstein
Fenner
Leder
Messenger/Baumgartner
Anthony Pomykala, Illinois State Police
Mott

MMOTT/td/12-1-80

Hazardous Waste Transporter Inspection Report

1. Transporter Name: Chemical Waste Mngmt of Ill.

2. Address: 138 & I-94 P.O. Box 1296
Calumet City IL 60409

3. Vehicle Operator: David J. Visser

*4. EPA Identification Number: 180011850

5. ICC Number: none

6. State Transporter Permit Number: IL 0075/040 IN 987

7. License Plate Number & Date: Trailer 27833 Illinois
Trailer 28587 Illinois

	(YES)	(NO)
*8. Manifest accompanying waste.	(X)	( )
9. Generator provided transporter with at least three copies of manifest, (plus one for each additional transporter).	(X)	( )
10. Manifest contains:		
a. Manifest document number: 0243031 (IL)	(X)	( )
b. Generator name, address, telephone number, and EPA ID number.	(X)	( )
Caterpillar Tractor Co. Rt. 31 P.O. Box 348 Aurora, IL 60507 IL D005070651 859-5000		
c. Name and EPA ID number of each transporter	(X)	( )

		(YES)	(NO)
d.	Name, address, and EPA ID number of designated facility. ESL Rt. 1 Box 109 Elwood, IL 60421 7441174 5	(X)	( )
e.	Name, address, and EPA ID number of alternate facility (optional).	( )	(X)
f.	Description of hazardous wastes using DOT regulations:		
	(1) DOT proper shipping name	( )	(X) See comment
	(2) DOT hazardous class	(X)	( )
	(3) Identification number of hazardous waste	(X)	( )
	(4) Weight or volume	(X)	( )
	(5) Container type	(X)	( )
	(6) Number of containers	(X)	( )
*g.	Signature by hand of generator of the following certification: "This is to certify that the above named materials are properly classified, described, packaged, marked, and labeled and are in proper condition for transportation according to the applicable regulations of the Department of Transportation and EPA".	(X)	( )
*h.	Signature of each transporter and date of acceptance.	(X)	( )
*11.	Hazardous waste properly packaged (DOT Regs.). (if no, explain)	(X)	( )
*12.	Each container properly labeled (DOT Regs.). (if no, explain)	(X)	( )

	(YES)	(NO)
*13. Each container properly marked (DOT Regs.). (if no, explain)	(X)	( )

NOTE: Each container of 110 gallons or less must be marked with the following words:

HAZARDOUS WASTE - Federal Law Prohibits Improper Disposal. If found, contact the nearest police or public safety authority or the U.S. Environmental Protection Agency.
Generator's Name and Address: _____

Manifest Document Number: _____

*14. Vehicle properly placarded (DOT Regs.). NOTE: Placards must appear on both sides, front, and back of vehicle. (if no, explain)	(X)	( )

*Requirements of RCRA applicable to transporters.

Inspector Mike Mott

Agency U.S. EPA

Date 11/20/80

Time 9:00 AM

Location Frankfort Feeder - West

D.Corrective Action

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

REPLY TO THE ATTENTION OF:

HRE-8J

April 21, 1993

Ms. Ann Hastert
Environmental Coordinator
Caterpillar, Inc., Aurora Plant
Route 31
Aurora, Illinois 60507

Re: Visual Site Inspection
Caterpillar, Inc., Aurora Plant
Montgomery, Illinois
ILD 005 070 651

Dear Ms. Hastert:

The U.S. Environmental Protection Agency is enclosing a copy of the final Preliminary Assessment/Visual Site Inspection (PA/VSI) report for the referenced facility. The executive summary and conclusions and recommendations sections have been withheld as Enforcement Confidential.

If you have any questions, please call Francene Harris at (312) 886-2884.

Sincerely yours,

Kevin M. Pierard, Chief
Minnesota/Ohio Technical Enforcement Section
RCRA Enforcement Branch

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

REPLY TO THE ATTENTION OF:

HRE-8J

June 21, 1992

Ms. Ann Hastert
Caterpillar Inc.
Aurora Plant
P.O. Box 348
Aurora, Illinois 60507

Re: Visual Site Inspection
Caterpillar Inc., Aurora Plant
ILD 005 070 651

Dear Ms. Hastert:

The United States Environmental Protection Agency (U.S. EPA) Region V will conduct a Preliminary Assessment including a Visual Site Inspection (PA/VSI) at the referenced facility. This inspection is conducted pursuant to the Resource Conservation and Recovery Act, as amended (RCRA) Section 3007 and the Comprehensive Environmental Response, Compensation, and Liability Act, as amended (CERCLA) Section 104(e). The referenced facility has generated, treated, stored, or disposed of hazardous waste subject to RCRA. The PA/VSI requires identification and systematic review of all solid waste streams at the facility. The objective of the PA/VSI is to determine whether or not releases of hazardous wastes or hazardous constituents have occurred or are occurring at the facility which may require further investigation. This analysis will also provide information to establish priorities for addressing any confirmed releases.

The visual site inspection of your facility is to verify the location of all solid waste management units (SWMUs) and areas of concern (AOCs) to make a cursory determination of their condition by visual observation. The definitions of SWMUs and AOCs are included in Attachment I. The VSI supplements and updates data gathered during a preliminary file review. During this site inspection, no samples will be taken. A sampling visit to ascertain if releases of hazardous waste or constituents have occurred may be required at a later date.

Assistance of some of your personnel may be required in reviewing solid waste flow(s) or previous disposal practices. The site inspection is to provide a technical understanding of the present and past waste flows and handling, treatment, storage, and disposal practices. Photographs of the facility are necessary to document the condition of the units at the facility and the waste management practices used.

The VSI has been scheduled for July 7, at 9:00 am. The inspection team will consist of Jeff Indeck and William Earle of Resource Applications, Inc., a contractor for the U.S. EPA. Representatives of the Illinois Environmental Protection Agency (IEPA) may also be present. Your cooperation in admitting and assisting them while on site is appreciated.

The U.S. EPA recommends that personnel who are familiar with the present and past manufacturing and waste management activities be available during the VSI. Access to any relevant maps, diagrams, hydrogeologic reports, environmental assessment reports, sampling data sheets, environmental permits (air, NPDES), manifests and/or correspondence is also necessary, as such information is needed to complete the PA/VSI. Attachment II is a summary of the information required.

If you have any questions, please contact me at (312) 886-4448 or Francene Harris at (312) 886-2884. A copy of the Preliminary Assessment/Visual Site Inspection Report, excluding the conclusions and Executive Summary portion will be sent when the report is available.

Sincerely yours,

Kevin M. Pierard, Chief
OH/MN Technical Enforcement Section

enclosure

cc: Larry Eastep, IEPA-DLPC, Springfield
Cliff Gould, IEPA-DLPC, Maywood

ATTACHMENT I

Caterpillar Inc., Aurora Plant
Route 31
Montgomery, Illinois 60507

The definitions of solid waste management unit (SWMU) and area of concern (AOC) are as follows.

A SWMU is defined as any discernable unit where solid wastes have been placed at any time from which hazardous constituents might migrate, regardless of whether the unit was intended for the management of a solid or hazardous waste.

The SWMU definition includes the following:

- RCRA regulated units, such as container storage areas, tanks, surface impoundments, waste piles, land treatment units, landfills, incinerators, and underground injection wells
- Closed and abandoned units
- Recycling units, wastewater treatment units, and other units that U.S. Environmental Protection Agency has generally exempted from standards applicable to hazardous waste management units
- Areas contaminated by routine and systematic releases of wastes or hazardous constituents, such as wood preservative treatment dripping areas, loading or unloading areas, or solvent washing areas

An AOC is defined as any area where a release to the environment of hazardous wastes or constituents has occurred or is suspected to have occurred on a nonroutine or nonsystematic basis. This includes any area where such a release in the future is judged to be a strong possibility.

ATTACHMENT II

PROBABLE SOLID WASTE MANAGEMENT UNITS (SWMUs)

1. Little information was available to compile a list of solid waste management units (SWMUs) at your facility. Please list all waste management units at your facility. If possible, please provide as complete information for the waste unit in response to the questions below.

   From the list of probable SWMUs please address the following questions:

   - Do the above SWMUs still exist at the facility and are they in operation?
   - What are the start-up and closure dates of the above SWMUs?
   - What types of wastes are the SWMUs currently/formerly used for?
   - Name any SWMUs at your facility that have not been listed above. These would include hazardous waste storage areas, treatment units, or any other area or system at your facility dealing with hazardous waste including satellite accumulation areas.
   - What are the average volumes and rates of generation of waste streams?
   - Document any releases that have occurred at the facility. This includes spills or leaks of both wastes and raw product. Outline the action taken to clean up the release.

2. Please supply as much information as possible concerning the site history. This would include any information you have regarding past operations and any former owners/operators at this location.

3. Please provide a description of the primary processes taking place at your facility and the waste streams which are generated.

4. Describe the methods of treatment and disposal of generated waste utilized by your facility.

If available, the following items are requested:

- A detailed map of the facility showing current and former locations of SWMUs and production stations.
- Flow diagrams showing waste streams and waste management practices.
- Copies of any permits currently held by the facility.
- SARA Title III information and a copy of the facility contingency plan.

U.S. Environmental Protection Agency
Office of Waste Programs Enforcement
Contract No. 68-W9-0006

TES 9

Technical Enforcement Support at Hazardous Waste Sites Zone III Regions 5,6, and 7

PRC

PRC Environmental Management, Inc.

PRC Environmental Management, Inc.
233 North Michigan Avenue
Suite 1621
Chicago, IL 60601
312-856-8700
Fax 312-938-0118

PRELIMINARY ASSESSMENT/ VISUAL SITE INSPECTION

CATERPILLAR INC., AURORA PLANT MONTGOMERY, ILLINOIS ILD 005 070 651

FINAL REPORT

Prepared for

U.S. ENVIRONMENTAL PROTECTION AGENCY
Office of Waste Programs Enforcement
Washington, DC 20460

Work Assignment No.	:	C05087
EPA Region	:	5
Site No.	:	ILD 005 070 651
Date Prepared	:	February 19, 1993
Contract No.	:	68-W9-0006
PRC No.	:	009-C05087IL4N
Prepared by	:	Resource Applications, Inc. (William Earle)
Contractor Project Manager	:	Shin Ahn
Telephone No.	:	(312) 856-8700
EPA Work Assignment Manager	:	Kevin Pierard
Telephone No.	:	(312) 886-4448

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EXECUTIVE SUMMARY

Resource Applications, Inc. (RAI), performed a preliminary assessment and visual site inspection (PA/VSI) to identify and assess the existence and likelihood of releases from solid waste management units (SWMU) and other areas of concern (AOC) at the Caterpillar Inc., Aurora Plant (Caterpillar) facility in Montgomery, Kendall County, Illinois. This summary highlights the results of the PA/VSI and the potential for releases of hazardous wastes or hazardous constituents from SWMUs and AOCs identified. In addition, a completed U.S. Environmental Protection Agency (EPA) Preliminary Assessment Form (EPA Form 2070-12) is included in Attachment A to assist in prioritizing RCRA facilities for corrective action.

The facility assembles construction equipment from components which are made on site or brought in from off site. On-site production consists of cutting, grinding, and machining metals into the desired shape. Some of the parts are then heat treated or receive a phosphate coating, as the product requires. The parts are then painted, sometimes with just a primer and sometimes with a primer coat and a final coat. The various components are then moved to an assembly line where they are assembled into construction equipment. After assembly, the construction equipment is painted and filled with the appropriate working fluids. The equipment is then tested and stored prior to being shipped to the purchaser.

The primary hazardous waste streams generated at the Caterpillar facility are solvent-based paint sludge (D001, F003) and paint stripper (D002). The nonhazardous waste streams generated at the facility are water-based paint sludge, shop blast dust, iron phosphate sludge, coal flyash and boiler ash, waste quench oil, waste skim oil, industrial wastewater, API separator sludge, medical wastes, and incinerator ash. Lesser quantities of several other hazardous and nonhazardous wastes were generated at the Caterpillar facility as one-time generations.

Caterpillar submitted a Notification of Hazardous Waste Activity form to EPA on August 24, 1980. Caterpillar submitted a RCRA Part A permit application on September 12, 1980. This application listed one process code, S01 (container storage), with a 55,000-gallon capacity (part of the Resource Recovery Area, SWMU 1), and several waste codes: F001 (spent chlorinated solvents used in degreasing), F017 and F018 (paint wastes, since delisted by EPA), U226 (1,1,1, trichloroethane),

and U239 (xylene). A modified RCRA Part A permit application was submitted on August 17, 1987. This application listed the same process (container storage) and capacity (55,000 gallons), but had only two waste codes: D001 (ignitables) and D002 (corrosives). The facility closed its container storage area in 1990. The closure certification was approved, and the RCRA Part A permit application was withdrawn by the Illinois Environmental Protection Agency (IEPA) on February 22, 1991. The facility is presently regulated as a generator of hazardous waste.

This facility was built in 1957 for the Caterpillar Tractor Company on land that had previously been used for farming. Several buildings have been added since 1957. Operations began in 1958. The facility was built for the purpose that it serves today, the manufacture and assembly of construction machinery. In about 1989, the Caterpillar Tractor Company underwent a corporate name change to Caterpillar Inc.

The facility consists of several buildings, totalling 4.9 million square feet under roof, on 429.2 acres. The facility presently employs about 3,300 people working in three shifts. Facility access is controlled by a 6-foot-high fence and guard houses. Entry into the buildings is controlled either by guards or by keycard. The Resource Recovery Area (SWMU 1) is separately fenced with another 6-foot-high fence with a locked gate within the perimeter fence of the facility. The facility is guarded 24 hours per day, 365 days per year. The facility has a hazardous materials response van and trained personnel to respond to releases of hazardous substances at the facility. The facility also has its own small fire department.

The PA/VSI identified the following seven SWMUs at the facility:

Solid Waste Management Units

1. Resource Recovery Area
2. Wastewater Treatment System
3. Coal Flyash Collection System
4. Shot Blast Dust Collectors
5. Paint Sludge Satellite Accumulation Areas
6. Medical Waste Accumulation Area
7. PCB Waste Accumulation Area

No Areas of Concern were identified during the PA/VSI.

The potential for release to ground water, surface water, and on-site soils is low for all SWMUs. Wastes in SWMU 1 are managed on a concrete pad and all runoff is directed towards the Wastewater Treatment System (SWMU 2), which is constructed of concrete. SWMUs 3, 4, 5, 6, and 7 SWMUs manage waste indoors. SWMUs 3 and 4 discharge to the air under an IEPA air emissions permit. The potential for release to air from SWMUs 2, 5, 6, and 7 is low. Incinerator ash from SWMU 1 was observed blowing around during the VSI.

The nearest surface water body, the Fox River, is a lacustrine, limnetic, unconsolidated bottom, permanently flooded, diked wetland is located approximately 0.75 mile east of the facility. The Fox River is used for recreational, water supply, and drainage purposes.

Ground water in the area is used for municipal and industrial supply purposes. Three wells, used for drinking water and industrial water supply, are located on site. The Village of Montgomery relies primarily on five ground water wells, all upgradient of the facility. The closest well is located 1 mile northeast of the facility.

No critical habitats or endangered species are located in Kendall or Kane Counties.

RAI recommends that the nonhazardous incinerator ash in SWMU 1 be managed in a manner such that it does not become airborne when the wind blows. RAI recommends no further action for any of the other SWMUs at this time.

1.0 INTRODUCTION

PRC Environmental Management, Inc. (PRC), received Work Assignment No. C05087 from the U.S. Environmental Protection Agency (EPA) under Contract No. 68-W9-0006 (TES 9) to conduct preliminary assessments (PA) and visual site inspections (VSI) of hazardous waste treatment and storage facilities in Region 5. Resource Applications, Inc. (RAI), TES 9 team member, provided the necessary assistance to complete the PA/VSI activities for the Caterpillar Inc., Aurora Plant (Caterpillar) facility .

As part of the EPA Region 5 Environmental Priorities Initiative, the RCRA and CERCLA programs are working together to identify and address RCRA facilities that have a high priority for corrective action using applicable RCRA and CERCLA authorities. The PA/VSI is the first step in the process of prioritizing facilities for corrective action. Through the PA/VSI process, enough information is obtained to characterize a facility's actual or potential releases to the environment from solid waste management units (SWMU) and areas of concern (AOC).

A SWMU is defined as any discernible unit at a RCRA facility in which solid wastes have been placed and from which hazardous constituents might migrate, regardless of whether the unit was intended to manage solid or hazardous waste.

The SWMU definition includes the following:

- RCRA-regulated units, such as container storage areas, tanks, surface impoundments, waste piles, land treatment units, landfills, incinerators, and underground injection wells
- Closed and abandoned units
- Recycling units, wastewater treatment units, and other units that EPA has usually exempted from standards applicable to hazardous waste management units
- Areas contaminated by routine and systematic releases of wastes or hazardous constituents. Such areas might include a wood preservative drippage area, a loading or unloading area, or an area where solvent used to wash large parts has continually dripped onto soils.

An AOC is defined as any area where a release of hazardous waste or constituents to the environment has occurred or is suspected to have occurred on a nonroutine and nonsystematic basis. This includes any area where a strong possibility exists that such a release might occur in the future.

The purpose of the PA is as follows:

- Identify SWMUs and AOCs at the facility
- Obtain information on the operational history of the facility
- Obtain information on releases from any units at the facility
- Identify data gaps and other informational needs to be filled during the VSI

The PA generally includes review of all relevant documents and files located at state offices and at the EPA Region 5 office in Chicago.

The purpose of the VSI is as follows:

- Identify SWMUs and AOCs not discovered during the PA
- Identify releases not discovered during the PA
- Provide a specific description of the environmental setting
- Provide information on release pathways and the potential for releases to each medium
- Confirm information obtained during the PA regarding operations, SWMUs, AOCs, and releases

The VSI includes interviewing appropriate facility staff; inspecting the entire facility to identify all SWMUs and AOCs; photographing all visible SWMUs; identifying evidence of releases; making a preliminary selection of potential sampling parameters and locations, if needed; and obtaining additional information necessary to complete the PA/VSI report.

This report documents the results of a PA/VSI of the Caterpillar facility (EPA Identification No. ILD 005 070 651) in Montgomery, Kendall County, Illinois. The PA was completed on July 6, 1992. RAI gathered and reviewed information from the Illinois Environmental Protection Agency (IEPA) and from EPA Region 5 RCRA files. Additional information pertaining to the facility was obtained from publications from the U.S. Department of Agriculture (USDA), U.S. Department of Commerce (USDC), U.S. Geological Survey (USGS), and the U.S. Department of the Interior (USDI). The VSI was conducted on July 7, 1992. It included interviews with facility representatives and a walk-through inspection of the facility. RAI identified seven SWMUs and no AOCs at the facility.

RAI completed EPA Form 2070-12 using information gathered during the PA/VSI. This form is included as Attachment A. The VSI is summarized and eight inspection photographs are included in Attachment B. Field notes from the VSI are included in Attachment C.

2.0 FACILITY DESCRIPTION

This section describes the facility's location; past and present operations; waste generating processes and waste management practices; a history of documented releases; regulatory history; environmental setting; and receptors.

2.1 FACILITY LOCATION

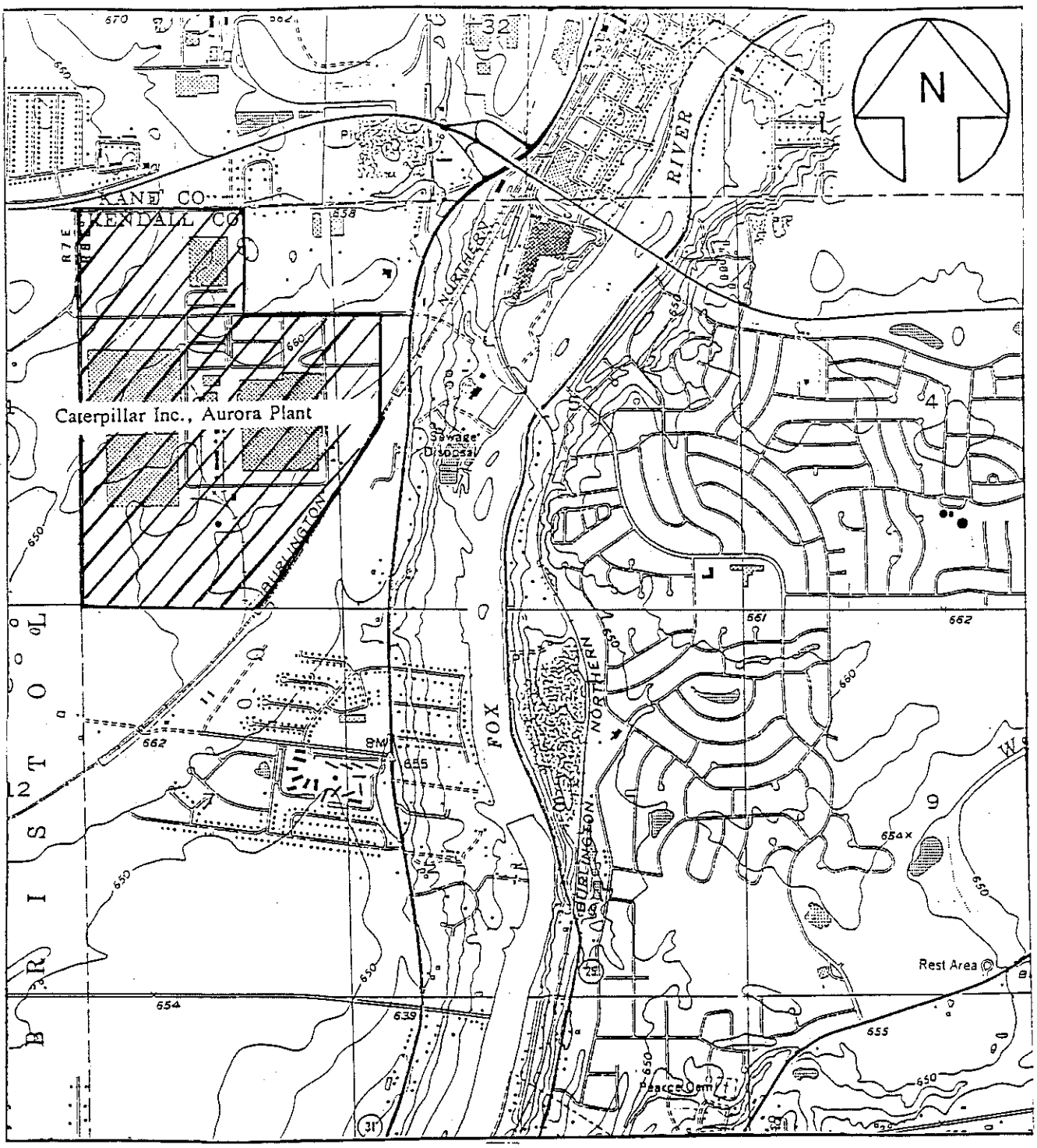
The Caterpillar facility is located on Route 31, south of Montgomery, Kendall County, Illinois (latitude 41°43′01″ N and longitude 88°21′33″ W). The facility, and its relationship to surrounding topographic features is shown in Figure 1. The facility's mailing address is P.O. Box 348, Aurora, Illinois, 60507. The facility occupies 429.2 acres in a mixed rural, commercial, and industrial area.

The Caterpillar facility is bordered on the north by Baseline Road, a former Caterpillar facility building, and U.S. Route 30; on the west by farmland; on the south by farmland; and on the east by a railroad, Route 31, some small businesses, and the Fox River.

2.2 FACILITY OPERATIONS

The facility assembles construction equipment from parts which are received from off site or made at the plant. These operations are conducted in various buildings located at this facility.

Parts received from off site are stored in building G. On-site production of parts is conducted in building B, and consists of cutting, grinding, and machining metal into the desired shape. Some welding is also performed in this building. Some of the parts are then heat treated, receive a phosphate coating, or are shot blasted, as the product requires. Some of the parts are painted with a primer in a paint booth prior to moving to the assembly line. The facility has several parts cleaners at various stages of production. The facility has several paint strippers that strip paint from parts that were incorrectly painted. Water-based, solvent-based, and dry paint are used at the facility. All painting is done in paint booths with spray guns or a closed flow coating system. Construction equipment is assembled on assembly lines in buildings K and H. The assembled equipment is then



Scale: 1:24,000

QUADRANGLE LOCATION

Source: Modified from USGS, 1980

Caterpillar Inc., Aurora Plant Montgomery, Illinois
Figure 1 FACILITY LOCATION
Resource Applications, Inc.

painted with a primer and a final coat prior to being filled with antifreeze, hydraulic oil, etc. The equipment is then tested and prepared for shipping. Support operations are conducted in several other buildings. These include the boilers and associated baghouse in building N, the Wastewater Treatment System (SWMU 2) in building R, and the electrical switch gear in building Q. Several other buildings house other support operations. Solid wastes generated from facility operations and the SWMUs where they are managed are discussed in detail in Section 2.3.

This facility was built in 1957 for the Caterpillar Tractor Company on land that had previously been used for farming. Several buildings have been added since 1957. Operations began in 1958. The facility was built for the purpose that it serves today, the manufacture and assembly of construction machinery. In about 1989, the Caterpillar Tractor Company underwent a corporate name change to Caterpillar Inc.

The facility consists of several buildings, totalling 4.9 million square feet under roof, on 429.2 acres. The facility presently employs about 3,300 people, working in three shifts. Facility access is controlled by a 6-foot-high fence and guard houses. Entry into the buildings is either by a guard post or by keycard. The Resource Recovery Area (SWMU 1) is separately fenced by a 6-foot-high fence with a locked gate within the perimeter fence of the facility. The facility is guarded 24 hours per day, 365 days per year. The facility has a hazardous materials response van and trained personnel to respond to releases of hazardous substances at the facility. The facility also has its own small fire department. The facility has an on site medical staff of doctors and nurses which monitor the health of the workers and provide additional medical assistance as necessary.

2.3 WASTE GENERATION AND MANAGEMENT

Wastes are generated and managed at various locations throughout the facility. SWMUs and their current status are identified in Table 1. The location of SWMUs in relation to the facility layout is shown in Figure 2. Present and past wastes generated at the facility are summarized in Table 2. SWMUs are discussed in detail in Section 3.0. Facility generation and management of both hazardous and nonhazardous wastes are discussed below.

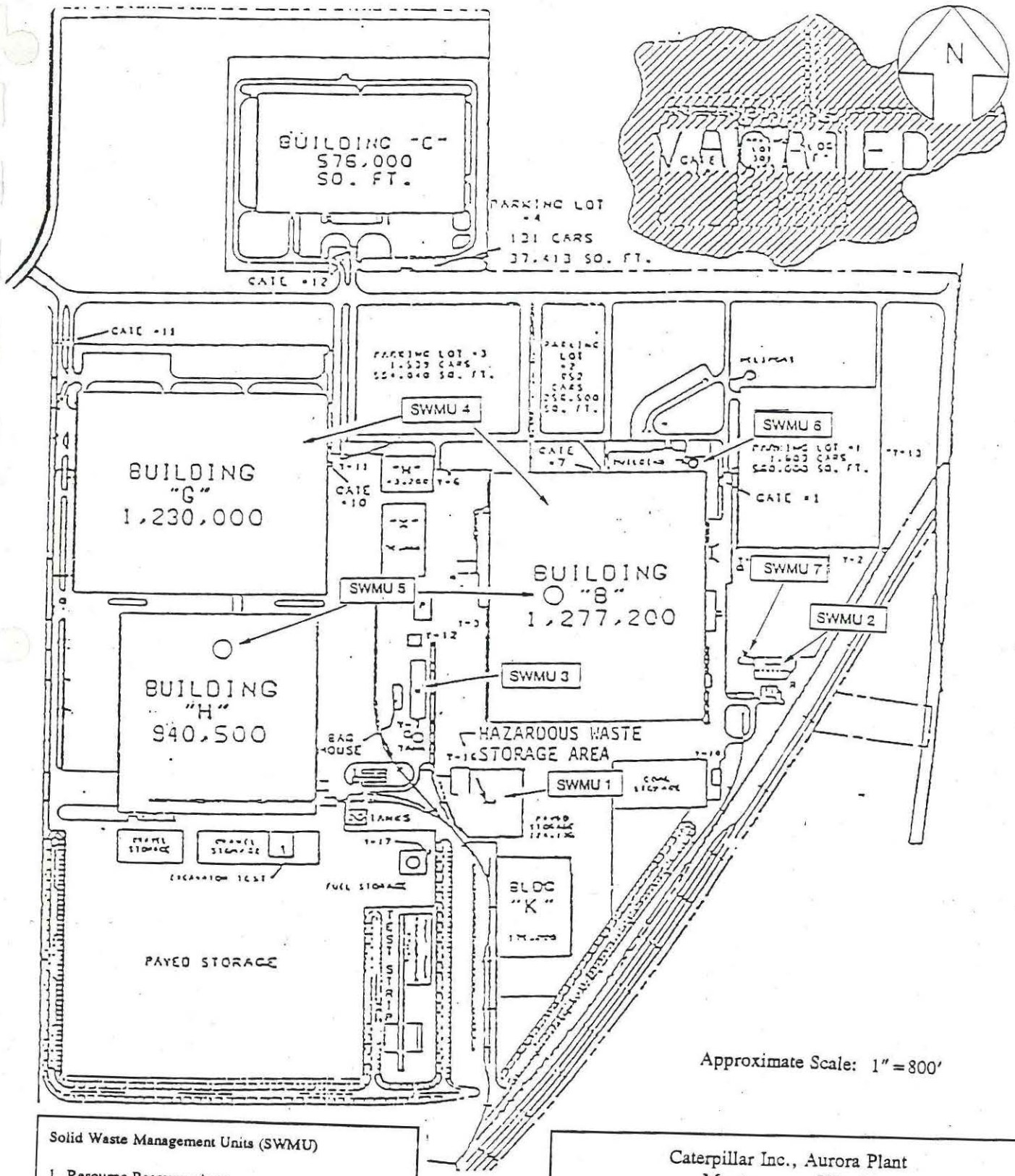
TABLE 1

SOLID WASTE MANAGEMENT UNITS

SWMU Number	SWMU Name	RCRA Hazardous Waste Management Unit[a]	Status
1	Resource Recovery Area	Yes	Active, RCRA closed in 1991, currently stores hazardous waste less than 90 days
2	Wastewater Treatment System	No	Active
3	Coal Flyash Collection System	No	Active
4	Shot Blast Dust Collectors	No	Active
5	Paint Sludge Satellite Accumulation Areas	No	Active
6	Medical Waste Accumulation Area	No	Active
7	PCB Waste Accumulation Area	No	Active

Note:

[a] A RCRA hazardous waste management unit is one that currently requires or formerly required submittal of a RCRA Part A or Part B permit application.



Solid Waste Management Units (SWMU)

1. Resource Recovery Area
2. Wastewater Treatment System
3. Coal Flyash Collection System
4. Shot Blast Dust Collectors
5. Paint Sludge Satellite Accumulation Areas
6. Medical Waste Accumulation Area
7. PCB Waste Accumulation Area

Caterpillar Inc., Aurora Plant
Montgomery, Illinois

Figure 2
FACILITY LAYOUT/SWMU LOCATION

Resource Applications, Inc.

TABLE 2

SOLID WASTES

Waste/EPA Waste Code[a]	Source	Solid Waste Management Unit[b]
Solvent-Based Paint Sludge/D001, F003	Painting Operations	1 and 5
Waste Paint Stripper/D002	Paint Stripping Operations	1
Water-Based Paint Sludge/NA	Painting Operations	1 and 5
Shot Blast Dust/NA	Shot Blasting	1 and 4
Iron Phosphate Sludge/NA	Phosphate Coating Process	1
Coal Flyash and Boiler Ash/NA	Boiler	3
Waste Quench Oil/NA	Heat Treating Process	None
Waste Skim Oil/NA	Wastewater Treatment System	2
Industrial Wastewater/NA	Various Processes	2
API Separator Sludge/NA	Wastewater Treatment System	2
Medical Waste/ORM[c]	Medical Facility	6

Notes:

[a] Not applicable (NA) designates nonhazardous waste.

[b] "None" indicates that the waste stream is not managed on site.

[c] "ORM" stands for other regulated material.

TABLE 2 (CONTINUED)

SOLID WASTES

Waste/EPA Waste Code[a]	Source	Solid Waste Management Unit[b]
Incinerator Ash	Trash Incinerator	1
PCB-Containing Waste Materials/ORM[c]	PCB-containing capacitors	7
Asbestos/ORM[c]	Asbestos abatement	Removed by contractor
Potassium Cyanide/P098[d]	Metallurgical Lab	1
Poison B/D008[d]	Metallurgical Lab	1
ORM-A/D002[d]	Metallurgical Lab	1
Oxidizer N.O.S./D001[d]	Metallurgical Lab	1
Corrosive Liquid/D002[d]	Metallurgical Lab	1
Alkaline Corrosive Liquid/D002[d]	Metallurgical Lab	1
Flammable Liquid/D001[d]	Metallurgical Lab	1
Lithium Bromide Solution/D002[d]	Removal of air cooling equipment	1

Notes:

[a] Not applicable (NA) designates nonhazardous waste.

[b] "None" indicates that the waste stream is not managed on site.

[c] "ORM" stands for other regulated material.

[d] These wastes were a one-time generation.

The primary hazardous waste streams generated at the Caterpillar facility are solvent-based paint sludge (D001, F003) and paint stripper (D002). The nonhazardous waste streams generated at the facility are water-based paint sludge, shot blast dust, iron phosphate sludge, coal flyash and boiler ash, waste quench oil, waste skim oil, industrial wastewater, API separator sludge, medical wastes, and incinerator ash. Lesser quantities of several other hazardous and nonhazardous wastes, including asbestos and polychlorinated biphenyl (PCB)-containing wastes, were generated at the Caterpillar facility as one-time generations.

Solvent-based paint sludge (D001, F003) is generated from the cleaning of the manufacturing painting equipment. The spray guns are washed with a butyl-cellusolve-based solvent, to remove paint residue. This waste is managed in a 55-gallon drum in one of the Paint Waste Satellite Accumulation Areas (SWMU 5). This waste was managed as a F016 and F017 hazardous waste until EPA delisted those waste streams. After accumulation in SWMU 5, the waste is moved to the Resource Recovery Area (SWMU 1) prior to being disposed of off site. A total of 1,235 gallons of this waste was generated during 1991 and was shipped off-site to the Safety-Kleen Corporation facility in Dolton, Illinois for reclamation.

Waste paint stripper (D002) is generated from stripping paint from improperly painted parts, prior to repainting. This process uses a caustic paint stripper and is located inside building G. This waste is drained from the stripping tanks into 55-gallon drums, which are then moved to SWMU 1. A total of 1,205 gallons of this waste was generated during 1991, and was shipped off site by Chemical Waste Management (CWM) to their Emelle, Alabama facility for treatment.

A water-based paint sludge (nonhazardous) is generated from cleanup of water-base painting operations at the facility. This waste is accumulated in 55-gallon drums in SWMU 5. The waste is then transported to SWMU 1, prior to shipment for disposal. This waste is managed as a special waste and 26,380 gallons were generated in 1991. This waste is shipped off site by CWM to their Controlled Waste Division (CWD) landfill in Menomonee Falls, Wisconsin, for disposal or to EPI of Toledo, Ohio, for disposal.

Shot blast dust (nonhazardous) is removed from the Shot Blast Dust Collectors (SWMU 4) by gravity. This waste is managed as a special waste in 55-gallon drums, at SWMU 4 for accumulation,

and at SWMU 1 for storage, prior to disposal at the CWM CWD landfill. A total of 800 gallons of this waste was removed in 1991.

An iron phosphate sludge (nonhazardous) is generated from phosphate coating operations. This waste is managed in 55-gallon drums, which are filled from the phosphate coating during cleanout. The waste is subsequently taken to SWMU 1 for accumulation prior to disposal. This waste is managed as a special waste and 2,035 gallons were generated during 1991. This waste is transported and disposed of by CWM at its Emelle, Alabama landfill.

Coal flyash and boiler ash (nonhazardous) is generated from the facility's coal-fired boiler and from particulate removal in the Coal Flyash Collection System (SWMU 3) associated with the boiler. This waste is managed as a special waste in a 20-cubic-yard dumpster. This waste was generated at the rate of 4,400 cubic yards per year in 1991, and is hauled by Great Lakes Disposal to the CDT Landfill in Joliet, Illinois.

Waste quench oil (nonhazardous) is generated from cleanout of the heat treating operation. This waste is generated in irregular quantities when the quench oil is no longer usable and is removed from the process tanks in bulk. Typically, the waste quench oil is pumped into trucks and disposed of with the skim oil from the Wastewater Treatment System (SWMU 2). Other times, the waste quench oil is pumped into trucks and disposed of separately. SWMU 2 does not manage waste quench oil. No waste quench oil was generated during 1991.

Waste skim oil (nonhazardous) is generated from oil skimming operations at SWMU 2. This waste is managed in a 5,000-gallon bulk tank (part of SWMU 2) and 163,800 gallons were generated in 1991. This waste is transported by Metalworking Lubricants for reclamation at their Indianapolis, Indiana facility.

Industrial wastewater (nonhazardous) is generated from various cooling and washing processes. This waste typically contains some oil and dissolved metals. This waste is treated by skimming surface oil and allowing solids to settle in the API separator, followed by batch treatment of the wastewater. The batch treatment process can include the addition of flocculants, precipitation, and pH adjustment, as necessary. Following batch treatment, the wastewater is run through an air

flotation tank where any additional sludge is removed and combined with the API separator sludge, prior to discharge to the Village of Montgomery Publicly Owned Treatment Works (POTW).

API separator sludge (nonhazardous) is generated from the operation of the API separator in SWMU 2. This sludge is generated at the rate of 40,000 gallons per month, and is managed in two 30,000-gallon holding tanks that are part of SWMU 2. This waste is then taken to the Metalworking Lubricants Co. for disposal at their Indianapolis, Indiana facility.

Medical waste is generated from the facility's two nurse's stations and doctor's office. This waste consists of "sharps" (that is, needles in an appropriate container), bandages, and used antiseptic wipes, generated in providing care to the facility's employees and is managed in the Medical Waste Accumulation Area (SWMU 6). Approximately 1 cubic yard per month of this waste is generated. This waste is hauled by Browning-Ferris Industries (BFI) for disposal. The facility representative was unable to provide additional information about this waste.

Incinerator ash (nonhazardous) is generated by burning trash (broken wood pallets, paper, cardboard, some plastic) in the facility's trash incinerator. The waste is taken from the incinerator to SWMU 1. In 1991, 1,220 cubic yards of this waste was generated. This waste was hauled by Great Lakes Disposal at the CDT landfill in Joliet, Illinois.

PCB-containing waste materials are generated in small quantities (typically less than one 55-gallon drum per year) at the facility during removal of PCB contaminated equipment (primarily ballasts and capacitors) as they need replacement. The facility is accumulating PCB-contaminated wastes at the PCB Waste Accumulation Area (SWMU 7). The facility has never had transformers that contain PCBs.

In the past, the facility has generated several other wastes. Asbestos was generated as part of an asbestos abatement program. The asbestos was removed several times by outside contractors during periods that the facility was shut down. Potassium cyanide (P098) was generated from an unknown process. The following wastes were generated as part of a lab pack from the metallurgical laboratory in 1989: Poison B (D008, 30 gallons), ORM-A (D002, 5 gallons), Oxidizer N.O.S. (D001, 5 gallons), corrosive liquid (D002, 10 gallons), alkaline corrosive liquid (D002, 5 gallons),

and flammable liquid (D001, 5 gallons). A lithium bromide solution (D002) was generated in 1987 during removal of air cooling equipment. All these wastes were managed in SWMU 1 prior to off-site disposal.

2.4 HISTORY OF DOCUMENTED RELEASES

This section discusses the history of documented releases to ground water, surface water, air, and on-site soils at the facility.

There have been two spills of water-based paint at the facility, both less than the reportable quantity (as listed in 40 Code of Federal Regulations Part 302). One spill occurred on pavement outside and was subsequently directed via the storm sewer to the facility's Wastewater Treatment System (SWMU 2). The second spill, inside the plant, led to the removal of 5 cubic yards of contaminated soil for disposal. The dates of these spills and the disposal facility for the contaminated soil was not known by the facility's representative.

Another spill of a nonhazardous red dye was discovered after it had washed into the facility's Wastewater Treatment System (SWMU 2). The dye had been dumped down a drain connected to SWMU 2. The facility representative stated that the spill was reported to IEPA, but no testing was required. The red dye was contained by SWMU 2. This spill was believed to be less than the reportable quantity for this red dye.

The facility has had several minor spills of acids and oils within the plant. All such incidents resulted in implementation of the facility's contingency plan. No additional information is available for these incidents.

2.5 REGULATORY HISTORY

Caterpillar submitted a Notification of Hazardous Waste Activity form to EPA on August 24, 1980. (No copy of this was available in EPA or IEPA files). Caterpillar submitted a RCRA Part A permit application on September 12, 1980 (Caterpillar, 1980). This application listed an S01 process code (container storage), with a 55,000-gallon capacity. The S01 process code referred to part of the

Resource Recovery Area (SWMU 1). The RCRA Part A permit application also listed the following waste codes: F001 (spent chlorinated solvent used in degreasing, which was listed protectively as the facility did not conduct degreasing operations), F017 and F018 (paint wastes, since delisted and now managed as a D001 and F003 waste), U226 (1,1,1 trichloroethane, not used) and U239 (xylene, used as a paint cleaning solvent, but was not disposed of under this waste code). IEPA notified Caterpillar that the RCRA Part A permit application was incomplete, citing many deficiencies, and denied the application (IEPA, 1981a). A modified RCRA Part A permit application was submitted on August 17, 1987 (Caterpillar, 1987). No correspondence regarding the Part A permit application was found in files available during the PA. This application listed the same process (container storage) and capacity (55,000 gallons), but had only two waste codes: D001 (ignitables) and D002 (corrosives).

In March 1989, the facility submitted a closure plan for the drum storage area part of the Resource Recovery Area (SWMU 1) (Caterpillar, 1989a). On June 21, 1989, IEPA rejected the closure plan, citing several deficiencies (IEPA, 1989). A modified closure plan was submitted in July 1989 (Caterpillar, 1989b). No copy of IEPA's approval of this closure plan was available, however, the closure certification was approved and the RCRA Part A permit application was withdrawn by IEPA on January 16, 1991 (IEPA, 1991b). The facility is presently regulated as a generator of hazardous wastes.

The Caterpillar facility has been inspected several times by IEPA (IEPA, 1981b, 1985a, 1985c, 1987b, 1987c, 1988, 1991a). Some violations of interim status standards were noted. These were mostly paperwork violations, (that is, failing to have a closure plan and failing to keep adequate training records). Several compliance inquiry letters and one pre-enforcement conference letter were issued, but all violations were subsequently resolved (IEPA, 1985b, 1985d, 1987a, 1987d, 1987e, 1987f, 1991a, 1991b, 1991c). The facility has not been inspected by IEPA since the January 1991 inspection.

The facility maintains several IEPA air emissions permits for various operations at the facility. These include permits for the boilers (including SWMU 3), Shot Blast Dust Collectors (SWMU 4), and the heat treating process (Caterpillar, 1980).

The facility is applying for a National Pollutant Discharge Elimination System (NPDES) permit for storm water discharge, which is not currently required, but will be required pursuant to the Clean Water Act of 1991. The facility discharges its wastewaters to the Village of Montgomery POTW, after treatment. The noncontact cooling water and the sanitary wastewaters are not treated prior to discharge. The Wastewater Treatment System (SWMU 2) discharge is permitted under a local sewer permit with the Village of Montgomery.

The facility does maintain two underground storage tanks (UST), one for gasoline and the other for diesel fuel. These were installed in 1987, replacing two tanks that were installed when the facility was built in 1957. According to the facility representative, no release was detected during the UST replacement, which included soil sampling. The new USTs are double-walled fiberglass and are equipped with a leak detection system which monitors the distribution pipes as well.

The facility did receive some industrial wastewaters from a parts washer, from an off-site caterpillar-owned satellite building with a different EPA Identification number during the early 1980s. These wastewaters were transported by truck and treated at the facility's Wastewater Treatment System (SWMU 2).

There has been no CERCLA activity at the facility.

2.6 ENVIRONMENTAL SETTING

This section describes the climate; flood plain and surface water; geology and soils; and ground water in the vicinity of the facility.

2.6.1 Climate

The climate in Kendall County is temperate and continental. The average daily temperature is 47.5 degrees Fahrenheit (°F). The lowest average daily temperature is 16°F in January. The highest average daily temperature is 83°F in July (NOAA, 1990).

The total annual precipitation for the county is 35.62 inches (Ruffner, 1985). The mean annual lake evaporation for the area is about 30 inches (USDC, 1968). The 1-year, 24-hour maximum rainfall is 2.5 inches (USDC, 1963).

The prevailing wind is from the west. Average wind speed is highest in March at 12 miles per hour from the north-northwest. The average wind speed is 10.3 miles per hour in a westerly direction (NOAA, 1990).

2.6.2 Flood Plain and Surface Water

The Caterpillar facility is not located in the 100- or 500-year floodplain (FEMA, 1982).

Surface water runoff from the site is handled by storm sewers. The runoff from areas that might pose environmental problems, such as the Resource Recovery Area (SWMU 1), aboveground raw material storage tank areas, and loading docks, is directed to the facility's Wastewater Treatment System (SWMU 2). The other storm water runoff is directed to an outfall to the Fox River with a concrete cascade. The facility is applying for an NPDES permit for this outfall pursuant to the Clean Water Act of 1991.

The nearest surface water body, the Fox River, is located 0.75 mile east of the facility and is used for drinking water supply, drainage, and recreational purposes.

2.6.3 Geology and Soils

Surface soils at the facility are classified as Urban Land (USDA, 1979). These soils have been extensively altered due to construction of buildings and roads. Typically, this land is built up and paved with streets and parking lots, altering the characteristics of the natural soils. The facility has a network of sewers and other underground utilities.

Beneath the surface soils lie soils belonging to the St. Charles Moraine unit of the Yorkville Member of the Wedron formation (Willman and Lineback, 1970). These soils typically consist of mostly gray to dark gray clayey tills and locally silty clayey till. These soils contain abundant small

pebbles, local lenses of silts, and, less commonly, lenses of sand and gravel. These deposits are from the Woodfordian substage of the Wisconsinan stage of glaciation. These soils are estimated to be about 100 feet thick in the vicinity of the facility (Willman, 1971).

The uppermost bedrock beneath the facility is part of the Ordovician Maquoketa Group, consisting mainly of grey and green shale, with some olitic limestones and dolomites in the upper half. Beneath the Maquoketa rocks are dolomites of the Galena-Platteville Group, sandstones of the Ancell (Glenwood-St. Peter) Group, and sandstones and dolomites of the Prairie du Chien Group. Beneath the Ordovician rocks are sandstones, siltstones, and dolomites of Cambrian age, underlain by Precambrian granite basement at depths of 3,000 to 5,000 feet. The exact thickness of the above-mentioned units are not known; however, the combined thickness of the Silurian rocks, and the Ordovician Maquoketa and Galena-Platteville groups is approximately 500 feet (Willman, 1971).

2.6.4 Ground Water

According to the facility representative, three deep wells exist at the facility to supply water for facility operations. These wells are used to supply drinking water as well as process water for the facility, and are from 1,346 to 1,384 feet deep. The water quality from these wells is monitored daily by the facility and tested quarterly by an outside laboratory. There have been no water quality problems. Approximately 111 million gallons of water are pumped from these wells annually.

No site-specific ground water information was available, so regional information is presented here. The glacial tills in the vicinity of Caterpillar may contain some sand and gravel lenses, which are good sources of ground water. Domestic ground water supplies are readily available from sand and gravel lenses. Two of the five wells utilized by the Village of Montgomery are in sand and gravel and located at depths of 59 feet and 82 feet (RAI, 1992). Dolomite lies directly beneath the glacial drift, and yields ground water at most locations through open crevices and channels. The deeper Galesville sandstone (of Cambrian age) is encountered at a depth of between 1,000 and 2,000 feet, and is used for industrial and municipal ground water supplies. In addition, the Ordovician-St. Peter sandstone is a local source of large water supplies, and is approximately 500 feet thick in the vicinity of Aurora (Bergstrom, et al., 1955).

The location of the nearest off-site ground water well is not known. The Village of Montgomery obtains its drinking water from ground water sources (RAI, 1992). Ground water in the area generally flows south. The depth to shallow ground water on the site is not known.

2.7 RECEPTORS

The Caterpillar facility occupies 429.2 acres in a rural, commercial, and industrial area in Montgomery, Illinois. Montgomery has a population of 3,363 people, and is located immediately south of Aurora, which has a population of 81,293 people.

The Caterpillar facility is bordered on the north by Baseline Road, a former Caterpillar facility building, and U.S. Route 30; on the west by farmland; on the south by farmland; and on the east by a railroad, Illinois Route 31, some small businesses, and the Fox River. The nearest school, Nicholson School, is located 1.9 miles northeast of the facility. The nearest residence is located 0.5 mile east of the facility.

Facility access is controlled by a 6-foot-high fence and guard houses. Entry into the buildings is either by a guard post or by keycard. The Resource Recovery Area (SWMU 1) is separately fenced by a 6-foot-high fence with a locked gate, within the perimeter fence of the facility. The facility is guarded 24 hours per day, 365 days per year. The facility has a hazardous materials response van and trained personnel to respond to releases of hazardous substances at the facility. The facility also has its own small fire department.

The nearest surface water body and wetland, the Fox River, is located approximately 0.75 mile east of the facility and is used for recreational, municipal water supply, and drainage purposes. The Fox River is classified as a lacustrine, limnetic, unconsolidated bottom, permanently flooded, diked wetland (USDI, 1984). No critical habitats or endangered species are located in Kendall or Kane Counties.

Ground water in the area is used for municipal and industrial supply purposes. Three wells, 1,346 to 1,384 feet deep and used for drinking water and industrial water supply, are located on site.

Ground water and surface water from the Fox River are used as a drinking water source in the area. The Village of Montgomery relies primarily on five ground water wells. The closest well is located upgradient, approximately 1 mile northeast of the facility (RAI, 1992). Some of the surrounding farms and residences may have wells that are used for drinking water.

3.0 SOLID WASTE MANAGEMENT UNITS

This section describes the seven SWMUs identified during the PA/VSI. The following information is presented for each SWMU: description of the unit, dates of operation, wastes managed, release controls, history of documented releases, and RAI's observations. Figure 2 shows the SWMU locations, and Section 2.3 discussed waste generation, management, and disposition.

SWMU 1 **Resource Recovery Area**

Unit Description: The Resource Recovery Area is a paved, outdoor area, approximately 400 feet by 300 feet in size, located near building Y-16 in the south-central part of the facility. This unit is paved with 12-inch-thick concrete. This area is used to accumulate most wastes prior to disposal. This area includes a drum storage area where hazardous and nonhazardous wastes are accumulated, and concrete bins of various sizes which are used to manage incinerator ash and scrap metal (see Photographs No. 1 and 2). A portion of this unit has low walls to separate piles of scrap metal and incinerator ash.

Date of Startup: This unit began operation in 1958.

Date of Closure: This unit is active. The hazardous waste storage section of this unit was RCRA closed in 1991, and is currently used for less than 90-day accumulation of hazardous wastes.

Wastes Managed: This unit manages solvent-based paint sludge (D001, F003) and caustic waste paint stripper (D002), and nonhazardous water-based paint sludge, shot blast dust, iron phosphate sludge and incinerator ash. This unit also managed various chemicals in lab packs when they were generated (see Table 2 for a complete list). These wastes are disposed of off-site by several different companies.

Release Controls:	The unit is located on a concrete pad and has concrete and wood walls approximately four feet high. The walls are used to separate piles of bulk material, the drum storage area, and storm sewer drains connected to the facility's Wastewater Treatment System (SWMU 2).
History of Documented Releases:	No releases from this unit have been documented.
Observations:	Over 100 drums of various wastes were present at the drum storage area portion of this unit during the VSI. Several piles of sorted scrap metal were observed in the concrete bins. Some incinerator ash was blowing around. RAI noted no other evidence of release.
SWMU 2	**Wastewater Treatment System**
Unit Description:	This unit treats industrial wastewaters before discharging into the Village of Montgomery POTW. The unit consists of a 10,000-gallon wet well, an API separator, three 100,000-gallon batch treatment tanks, two 30,000-gallon sludge wells, an air flotation tank, a 5,000-gallon concrete skim oil tank, and associated pumps, piping, water treatment chemical tanks, and control system. The system is located in and around building R. The industrial wastewater is first accumulated in the wet well prior to being pumped to the API separator. The API separator skims off oil and allows sludge to settle out, which is then moved to the sludge wells. The wastewater is then pumped to one of the batch treatment tanks for treatment. After treatment, the wastewater is pumped to an air flotation tank where sludge, generated during treatment (mostly an oily sludge, but may also contain precipitated iron and zinc), is removed prior to discharge to the Village of Montgomery POTW. This sludge is combined and managed with the API separator sludge. All tanks are constructed of 8-inch-thick concrete, and are located aboveground except the skim oil

tank, which is an aboveground 5,000-gallon steel tank (see Photograph No. 3).

Date of Startup: This unit began operation in 1968.

Date of Closure: This unit is active.

Wastes Managed: This unit manages nonhazardous industrial wastewaters generated during facility operations, storm water runoff from portions of the facility, waste skim oil, and API separator sludge that the unit generates during operation. The skim oil and API separator sludge are disposed of off-site by Metalworking Lubricants of Indianapolis, Indiana.

Release Controls: The water treatment chemical tanks and the control system are contained inside a building. The remainder of the unit is located outdoors. All of the process tanks are made of concrete approximately 8 inches thick.

History of Documented Releases: No releases from this unit to the POTW, exceeding permit limitations, have been documented since 1985. No releases to on-site soils, surface water, ground water, or air from this unit have been documented.

Observations: The unit was in operation at the time of the VSI. The concrete that was visible was in good condition. RAI noted no evidence of release.

SWMU 3 **Coal Flyash Collection System**

Unit Description: This unit consists of a baghouse, filtering equipment, and a 20-cubic-yard steel dumpster used to collect flyash from the coal-fired boilers

that supply heat to the facility. The baghouse and filtering equipment are located in building N and the dumpster is located adjacent to building N. The baghouse and filtering equipment are constructed primarily of steel. The unit uses cyclone separators and filters to separate the flyash, which then falls into the dumpster (see Photograph No. 4).

Date of Startup: This unit began operation about 1981.

Date of Closure: This unit is active.

Wastes Managed: This unit manages coal flyash (nonhazardous) from the burning of coal in the facility boilers. This waste is hauled by Great Lakes Disposal to the CDT Landfill in Joliet for disposal.

Release Controls: This unit is a release control for flyash from the burning of coal for the boilers. Flyash is collected in a steel dumpster.

History of Documented Releases: No releases from this unit that exceed its IEPA air emissions permit have been documented.

Observations: No visible emissions were coming from this unit. RAI noted no evidence of a release. The dumpster used to collect flyash was not covered.

SWMU 4 **Shot Blast Dust Collectors**

Unit Description: The unit collects dust generated from the shot blasting operations in the northwest part of building B and in building G. The unit consist of Wheelabrator cyclonic dust collectors and 55-gallon steel drums. The dust collectors are located above the shot blast units and vacuum

shot blast dust from the exhaust air streams and deposit it into the drum (see Photograph No. 5).

Date of Startup: This unit began operation about 1981.

Date of Closure: This unit is active.

Wastes Managed: This unit manages shot blast dust (nonhazardous) from the shot blast operation. When full, the accumulation drum is moved to SWMU 1 prior to off-site disposal at the CWM Landfill.

Release Controls: The unit is a release control for air emissions. The waste is a solid and is contained in a drum. The unit is located indoors on a concrete floor. The unit operates under an IEPA air emissions permit. No floor drains are located in the vicinity of this unit.

History of Documented Releases: No releases exceeding the IEPA air emissions permit from this unit have been documented.

Observations: The unit was not being used at the time of the VSI. RAI noted no evidence of release.

SWMU 5 **Paint Sludge Satellite Accumulation Areas**

Unit Description: The unit consists of 55-gallon steel drums located adjacent to paint booths in buildings B and H. The drums contain solvent-based paint sludge (F003, D001) and water-based paint sludge (nonhazardous), generated from cleaning painting equipment. This unit is located in designated areas approximately 10 feet by 30 feet, on a concrete floor at least 8 inches thick (see Photograph No. 6).

Date of Startup:	This unit began operation in 1958.
Date of Closure:	This unit is active.
Wastes Managed:	This unit manages solvent-based paint sludge (D001, F003) and water-based paint sludge (nonhazardous, managed as a special waste) separately. After accumulation, the drums are moved to SWMU 1 prior to off-site disposal.
Release Controls:	There are no floor drains located in the vicinity of this unit. This unit is located on a concrete floor.
History of Documented Releases:	No releases from this unit have been documented.
Observations:	The waste accumulation drum was not present at the time of the VSI. There were several product drums in this area. RAI noted no evidence of release.

SWMU 6 **Medical Waste Accumulation Area**

Unit Description:	This unit consists of a red plastic bag in a 1-cubic-yard cardboard box located in the medical supply room in building A. This unit is used to manage medical wastes generated from the facility's on-site medical staff. This unit is located in building B (see Photograph No. 7).
Date of Startup:	This unit began operation in 1958.
Date of Closure:	This unit is active.
Wastes Managed:	This unit manages assorted medical wastes, including "sharps" and bandages.

Release Controls:	This unit is located inside on the ceramic tiled concrete floor. There are no floor drains in the vicinity of this unit.
History of Documented Releases:	No releases from this unit have been documented.
Observations:	At the time of the VSI, the bag was partially filled. RAI noted no evidence of release. The lid of the box was uncovered for the photograph.

SWMU 7 **PCB Waste Accumulation Area**

Unit Description:	This area consists of two 55-gallon steel drums of PCB-contaminated capacitors, located in building Q, in a steel bin, on a concrete floor (see Photograph No. 8).
Date of Startup:	This unit began operation about 1980.
Date of Closure:	This unit is active.
Wastes Managed:	This unit manages PCB-contaminated wastes generated at the facility.
Release Controls:	The drums are located in a steel bin with 8-inch sides, located inside building Q on the north wall, on a concrete floor. The drums are filled with capacitors and an oil and grease absorbent.
History of Documented Releases:	No releases from this unit have been documented.
Observations:	The drums and steel bin were in good condition. Two boxes of unused oil and grease absorbent were also in the area. RAI noted no evidence of release.

4.0 AREAS OF CONCERN

No AOCs were identified by RAI during the PA/VSI. Caterpillar has two USTs at the facility, but these are of double-walled construction with interstitial monitoring. All releases at the facility have been remediated.

5.0 CONCLUSIONS AND RECOMMENDATIONS

The PA/VSI identified seven SWMUs and no AOCs at the Caterpillar facility. Background information on the facility's location; operations; waste generation and management; history of documented releases; regulatory history; environmental setting; and receptors is presented in Section 2.0. SWMU-specific information, such as the unit's description, dates of operation, wastes managed, release controls, history of documented releases, and observed condition, is presented in Section 3.0. AOCs are discussed in Section 4.0. Following are RAI's conclusions and recommendations for each SWMU. Table 3, at the end of this section, summarizes the SWMUs at the facility and the recommended further actions.

SWMU 1 **Resource Recovery Area**

Conclusions: This area manages all wastes generated at the facility excluding the liquid wastes, which are managed in bulk. This area is located outdoors and is surrounded by a 6-foot-high fence. Some incinerator ash was blowing from the incinerator ash pile. The potential for release to on-site soils, surface water, and ground water from this SWMU is low, due to the unit being located on a concrete pad and all runoff being directed to SWMU 2. Some of the nonhazardous incinerator ash is picked up by the wind and becomes airborne.

Recommendations: RAI recommends the incinerator ash be managed so that it does not become airborne.

SWMU 2 **Wastewater Treatment System**

Conclusions: The facility's Wastewater Treatment System treats industrial wastewaters generated from the facility and storm water runoff from certain areas of the facility. This SWMU is currently operating in compliance with its sewer discharge permit. The potential for release to ground water, surface water, on-site soils, and air from this unit is

low, due to the unit's construction, operation, and the nature of the wastes managed. This unit discharges to the Village of Montgomery POTW under a local sewer permit.

Recommendations: RAI recommends no further action for this SWMU at this time.

SWMU 3 **Coal Flyash Collection System**

Conclusions: This unit removes particulates from the exhaust of the facility's coal fired boilers. The potential for release to on-site soils, surface water, or ground water from this SWMU is low, due to the nature of the waste managed. This unit operates under an air emissions permit, and has not had compliance problems.

Recommendations: RAI recommends no further action for this SWMU at this time.

SWMU 4 **Shot Blast Dust Collectors**

Conclusions: This unit removes particulates generated during shot blasting operations at the facility. The potential for release to on-site soils, surface water, or ground water from this SWMU is low, due to the unit's indoor location and the nature of the waste managed. This unit operates under an air emissions permit, and has not had compliance problems.

Recommendations: RAI recommends no further action for this SWMU at this time.

SWMU 5 **Paint Sludge Satellite Accumulation Areas**

Conclusions: This SWMU manages paint sludge generated from the facility's painting operations. The potential for release to on-site soils, surface

water, ground water, and air from this SWMU is low as the unit is located indoors.

Recommendations: RAI recommends no further action for this SWMU at this time.

SWMU 6 **Medical Waste Accumulation Area**

Conclusions: This SWMU manages medical wastes generated by the facility's in-house medical staff. The potential for release to on-site soils, surface water, ground water, and air from this SWMU is low, as the unit is located indoors.

Recommendations: RAI recommends no further action for this SWMU at this time.

SWMU 7 **PCB Waste Accumulation Area**

Conclusions: This area is used to accumulate PCB-containing waste materials (presently capacitors) prior to off-site disposal. The potential for release to on-site soils, surface water, ground water, and air from this SWMU is low, as the unit is located indoors and has adequate containment.

Recommendations: RAI recommends no further action for this SWMU at this time.

TABLE 3

SWMU SUMMARY

SWMU	Dates of Operation	Evidence of Release[a]	Recommended Further Action
1. Resource Recovery Area	1958 to Present	Blowing incinerator ash was observed during the VSI.	Manage incinerator ash so that it does not become airborne.
2. Wastewater Treatment System	1968 to Present	None	No further action at this time.
3. Coal Flyash Collection System	1981 to Present	None[a]	No further action at this time.
4. Shot Blast Dust Collectors	1981 to Present	None[a]	No further action at this time.
5. Paint Sludge Satellite Accumulation Areas	1958 to Present	None	No further action at this time.
6. Medical Waste Accumulation Area	1958 to Present	None	No further action at this time.
7. PCB Waste Accumulation Area	1980 to Present	None	No further action at this time.

Notes:

[a] These units operate under an IEPA air emissions permit.

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Caterpillar, 1987. Revised RCRA Part A permit application, August 14.

Caterpillar, 1989a. Closure Plan, March.

Caterpillar, 1989b. Modified Closure Plan, July.

Caterpillar, 1992. Site map obtained during VSI, Figure 2, p.8

Federal Emergency Management Agency (FEMA), 1982. Community Panel Number 1703410030C, July 19.

Illinois Environmental Protection Agency (IEPA), 1981a. Letter to Caterpillar denying RCRA Part A permit application, March 26.

IEPA, 1981b. IEPA observation report of Caterpillar, March 16.

IEPA, 1985a. Compliance Inquiry Letter (CIL) regarding Closure Plan, March 6.

IEPA, 1985b. Letter to Caterpillar stating violations of 3/6/85 were resolved, July 26.

IEPA, 1985c. RCRA Inspection of Caterpillar, September 13.

IEPA, 1985d. Letter to Caterpillar stating that a 9/13/85 inspection found Caterpillar in compliance, October 1.

IEPA, 1987a. Letter to Caterpillar stating violations of 7/14/87 CIL were resolved, August 7.

IEPA, 1987b. RCRA Inspection of Caterpillar, August 20.

IEPA, 1987c. RCRA Inspection of Caterpillar, September 8.

IEPA, 1987d. Letter to Caterpillar stating violations were resolved, September 28.

IEPA, 1987e. Letter to Caterpillar stating violations of 9/30/87 were resolved, October 2.

IEPA, 1987f. Letter to Caterpillar stating violations of 10/20/87 were resolved, October 26.

IEPA, 1988. RCRA Inspection of Caterpillar, November 22.

IEPA, 1989. Letter to Caterpillar rejecting Closure Plan, June 21.

IEPA, 1991a. Followup of 12/20/90 inspection of Caterpillar, January 30.

IEPA, 1991b. Letter to Caterpillar approving closure and withdrawing RCRA Part A permit application, January 16.

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ATTACHMENT A

EPA PRELIMINARY ASSESSMENT FORM 2070-12

EPA

POTENTIAL HAZARDOUS WASTE SITE
PRELIMINARY ASSESSMENT
PART 1 - SITE INFORMATION AND ASSESSMENT

I. IDENTIFICATION

01 STATE	02 SITE NUMBER
IL	ILD 005 070 651

II. SITE NAME AND LOCATION

01 SITE NAME (Legal, common, or descriptive name of site)	02 STREET, ROUTE NO., OR SPECIFIC LOCATION IDENTIFIER				
Caterpillar Inc., Aurora Plant	Route 31				
03 CITY	**04 STATE**	**05 ZIP CODE**	**06 COUNTY**	**07 COUNTY CODE**	**08 CONG DIST**
Aurora	IL	60507	Kendall		
09 COORDINATES: LATITUDE	**LONGITUDE**				
41° 43' 01".N	88° 21' 33".W				

10 DIRECTIONS TO SITE *(Starting from nearest public road)*

Take Illinois Route 31 south from Aurora. Facility is located west of Illinois Route 31, south of U.S. Route 30.

III. RESPONSIBLE PARTIES

01 OWNER *(If known)*	02 STREET *(Business, mailing residential)*		
Caterpillar, Inc.	100 N.E. Adams Streer		
03 CITY	**04 STATE**	**05 ZIP CODE**	**06 TELEPHONE NUMBER**
Peoria	IL	61629	(309) 675-1000
07 OPERATOR *(If known and different from owner)*	**08 STREET** *(Business, mailing, residential)*		
09 CITY	**10 STATE**	**11 ZIP CODE**	**12 TELEPHONE NUMBER**

13 TYPE OF OWNERSHIP *(Check one)*

☒ A. PRIVATE ☐ B. FEDERAL: _____ (Agency name) ☐ C. STATE ☐ D. COUNTY ☐ E. MUNICIPAL

☐ F. OTHER _____ (Specify) ☐ G. UNKNOWN

14 OWNER/OPERATOR NOTIFICATION ON FILE *(Check all that apply)*

☒ A. RCRA 3010 DATE RECEIVED: 08 / 24 / 80 (MONTH DAY YEAR) ☐ B. UNCONTROLLED WASTE SITE *(CERCLA 103 c)* DATE RECEIVED: / / (MONTH DAY YEAR) ☐ C. NONE

IV. CHARACTERIZATION OF POTENTIAL HAZARD

01 ON SITE INSPECTION

☒ YES DATE 07 / 07 / 92

☐ NO

BY *(Check all that apply)*

☐ A. EPA ☒ B. EPA CONTRACTOR ☐ C. STATE ☐ D. OTHER CONTRACTOR

☐ E. LOCAL HEALTH OFFICIAL ☐ F. OTHER: _____ (Specify)

CONTRACTOR NAME(S): Resource Applications, Inc.

02 SITE STATUS *(Check one)*

☒ A. ACTIVE ☐ B. INACTIVE ☐ C. UNKNOWN

03 YEARS OF OPERATION

1958 (BEGINNING YEAR) | Present (ENDING YEAR) ☐ UNKNOWN

04 DESCRIPTION OF SUBSTANCES POSSIBLY PRESENT, KNOWN, OR ALLEGED

Solvent- and water-based paints, diesel fuel, gasoline, coal, coal flyash, iron phosphate sludge, oils, caustic paint stripper, iron, steel, ash from nonhazardous combustible materials, medical wastes, and shot blast dust.

05 DESCRIPTION OF POTENTIAL HAZARD TO ENVIRONMENT AND/OR POPULATION

Some of the nonhazardous ash from incinerating nonhazardous combustible materials was blowing around in SWMU 1

V. PRIORITY ASSESSMENT

01 PRIORITY FOR INSPECTION *(Check one. If high or medium is checked, complete Part 2 - Waste Information and Part 3 - Description of Hazardous Conditions and Incidents.)*

☐ A. HIGH *(Inspection required promptly)* ☐ B. MEDIUM *(Inspection required)* ☒ C. LOW *(Inspect on time-available basis)* ☐ D. NONE *(No further action needed; complete current disposition form)*

VI. INFORMATION AVAILABLE FROM

01 CONTACT	02 OF *(Agency/Organization)*			03 TELEPHONE NUMBER
Kevin Pierard	EPA Region V			(312) 886-4448
04 PERSON RESPONSIBLE FOR ASSESSMENT	**05 AGENCY**	**06 ORGANIZATION**	**07 TELEPHONE NUMBER**	**08 DATE**
William Earle		Resource Applications, Inc.	(312) 332-2230	2 / 19 / 93 (MONTH DAY YEAR)

ATTACHMENT B

VISUAL SITE INSPECTION SUMMARY AND PHOTOGRAPHS

VISUAL SITE INSPECTION SUMMARY

Caterpillar, Inc., Aurora Plant
Route 31
Montgomery, Illinois
ILD 005 070 651

Date:	July 7, 1992
Primary Facility Representative: Representative Telephone No.:	Ann Hastert, Environmental Coordinator (708) 859-5417
Inspection Team:	Jeff Indeck, Resource Applications, Inc. (RAI) William Earle, RAI
Photographer:	William Earle
Weather Conditions:	Rainy, temperature about 80°F
Summary of Activities:	The visual site inspection (VSI) began at 9:10 a.m. with an introductory meeting. The inspection team explained the purpose of the VSI and the agenda for the visit. Facility representatives then discussed the facility's past and current operations, solid wastes generated, and release history. Facility representatives provided the inspection team with copies of requested documents. The VSI tour began at 2:20 p.m. Photographs of all SWMUs were taken. The tour concluded at 4:45 p.m., after which the inspection team held an exit meeting with facility representatives. The VSI was completed and the inspection team left the facility at 5:00 p.m.

Photograph No. 1 Location: SWMU 1
Orientation: East Date: 7/7/92
Description: This is the drummed waste storage (and hazardous waste storage) area of the Resource Recovery Area (SWMU 1). Hazardous wastes are stored for less than 90 days.

Photograph No. 2 Location: SWMU 1
Orientation: Northwest Date: 7/7/92
Description: This is the bulk waste accumulation section of the Resource Recovery Area (SWMU 1)

Photograph No. 3 Location: SWMU 2
Orientation: North Date: 7/7/92
Description: This is the API separator. One of three 10,000-gallon holding tanks is on the left.

Photograph No. 4 Location: SWMU 3
Orientation: West Date: 7/7/92
Description: This is the coal flyash dumpster, which is located outside and below the Coal Flyash Collection System.

Photograph No. 5 Location: SWMU 4
Orientation: South Date: 7/7/92
Description: This is one of shot blast units and associated Shot Blast Dust Collector (with hose running down to drum).

Photograph No. 6 Location: SWMU 5
Orientation: West Date: 7/7/92
Description: This is one of the Paint Sludge Satellite Accumulation Areas (in blue) where the paint waste is accumulated. All drums present are unused product (paint). No paint waste was present at the time the picture was taken.

Photograph No. 7 Location: SWMU 6
Orientation: West Date: 7/7/92
Description: This is the Medical Waste Accumulation Area.

Photograph No. 8 Location: SWMU 7
Orientation: North Date: 7/7/92
Description: This is the PCB Waste Accumulation Area. The left drum is empty. The right drum has a few capacitors, which are stored with oil and grease absorbent.

ATTACHMENT C
VISUAL SITE INSPECTION FIELD NOTES

7/7/92 RAINY 70°, 9:15 ANN HASTERT ENV. COORD.

FACILITY CONST. IN 57. OCCUPIED IN 58
BLDG B IS ORIG. C - 60s - WAREHOUSE
68 - WWT OUTBLDGS G, H - 60s, K - 80
FARMLANDS. CAT BUILT ALL BLDGS.
CAT TRACTOR < 10 YR. CORP CHANGE CAT, INC.
4.9 MSQ FT UNDER ROOF.
BLDG C ADDED SPACE. WILL BE SOLD THIS WK
BLDG C +/- 13 ACRES.

N OF FACIL (N OF C) IS BASELINE
CAT OWNS W OF C TO ROAD
DALY TRUCK & KEENE TRUCKING & SMALL COS.
GARAGE, LANDSCAPE, FOODS ETC
N OF BASELINE; RES & STRIP MALL
N OF 30 IS APTS.
W IS FARMLANDS AND FARM. 1/4 OCCUPIED
S IS FARMLAND
E IS RAILROAD
NICHOLSON GRADE SCHOOL IN MONTGOMERY
COPLEY MEM HOSP. IN AURORA.
KENDALL COUNTY S OF 30
OSWEGO TSP.
CAT OWN FARM W & N OF C

82

Mailing: Box 348
Aurora 60507

Facility: Rte 31

CAT is owner and operator.
3 wells on prop. / is currently under repair
is Wellhouse 1.
Provide all water. No muni water.
Wells are #1 1384'
#2 1346
#3 1352
111,000,000 g/yr. Monitored daily/test Qtr.
CBC - Outside Labs samples water. No probs.
Flow is N → S. In LG Aquifer.
No other facil in same Aquifer.
Most residences are shallows.
Many surround farms
Oswego & Mont to muni water.
May be deep wells.
Fox River +/- 0.5 mi to E.R.
Storm to River to Cascade. Underground
& Dikes to prevent release
No NPDES at present. Will have Storm to Calc.
Surface: Both Above & Underground.

SOME SURFACE TO PRETREAT.
TANK FARM, OUTSIDE STORE, RECLAIM AREA
GOES TO PRETREAT. NOT A POINT SOURCE
PRETREAT ONLY / INDUSTRIAL. 200,K / DAY
COMBINES WITH SAN TO SAN DIST ACROSS STREET
DOES NOT GO TO RIVER DISCHARGE.
IWWT "WET WELL" IS SUMP - DOESN'T OVERLOAD SYSTEM
IMPROVES SEPARATOR FUNCTIONS.
DRAIN DITCHES AROUND CONCRETE ON S. FACIL
AS OPEN SEWER.
SAN CONNECTS W/ IWW AFTER R.
FACILITY FENCED. GATES CLOSED DURING NON OP.
OWN SECURITY 24-HRS ALL DAYS.
CARD ACCESS FOR BLDGS THAT ARE LOCK
2 MAIN SHIFTS 3RD SHIFT IS LIGHT.
7 DAYS A WEEK
3300 EMPLOY 2200 HR REST SALARIED.
MOST ON DAY SHIFT, 2ND REDUCED 3RD SMALL

OUTSIDE SPILL H_2O BASE PAINT. SEV YRS AGO
DIRT REMOVE
L RQ
HOLE IN BLDG. PART DRIPPED PAIN

FALL 91 DUMP DYE TO AAO
PUMP STATION OVERFLOW. MAY GO TO STORM
NO NOTICEABLE.

84

And since 1981

No evidece of Release.
Dyed WWT. Called IEPA.
Cautionary Response.
IEPA didn't require because < RQ.
No incident Number.
During Night Rainstorm. Not on Booms.

All spills cause implement of C.P.
Sometimes Park Lot Oil to Cascade.
Nothing else off Site.
Maybe Ditch Area. Rest of site on Concrete

Acids, Oils
Spill Materials. Truck. Security Also.
Has absorb. Cribs on Site.
Dri Rite, Tyvek.
Usually within Bldgs. / Long Time Ago
Spill H_2O Base Paint. Sewer Covered.
Sucked to Truck. Spill Stop & Sand.
Clean up to AAO.
Van for Cross to Cascade. Checked Daily.
Booms monitored.

COMPLIANCE SIGNS & LABELS.
STORE AREA W/ HAZ & NON HAZ.
SAME AREA SINCE PLANT STARTED
RESOURCE RECOVERY - ONLY ONE USE.
DRAIN TO AAO. CONCRETE SLOPES TO AREA
1" RAIN = 100 K GAL H_2O TO TREAT.

BERM S. OF FACIL FOR NOISE
BLACKBERRY CK TO ORCH RD. NO FLOW
NO ENDAG OR WETLANDS.
NO FLOOD EXCEPT IF LIFT STATION
LIFT STATIONS TO WWT. LIFT TO SANITARY.
SUMPS AT ALL LIFT STATIONS.
HOW MANY?

BUILDING B. FABRIC & ASSEMBLY
HEAT TREAT - QUENCH OILS.
INDIV. MACH. PUMP OUT
COOL, HYDRAULICS, CLEANER NO VAP DEG
NO PLAT., SMALL PAINT, WELD, SHOT BLAST
FABRICATES PARTS

BLDG 6 - WELD, PRESS - COOLANT
MACHINE - COOLS & OILS
CLEAN - CAUSTIC CLEAN.
PAINT - FLOW COAT
LG SYSTEM & PUMPS & DRAINS. DRAIN TO AAO.

BLDG M - ASSEMBLY. LARGE/MED WHEEL LOAD
EXCAV COMPACTOR
PAINT SPECIAL COLOR = SAA.
FILL & PRIME PROD OILS, ANT. FREEZE
NO MACHINING OR WELDING.
NOT MUCH WASTE. CLEAN OUT ONLY - ANNUAL

BLDG K - SMALL
POWDER PAINT - NO WASTE
WASH - CAUSTIC → AAO
NO COOLANTS.

UTIL BLDG - BUILDING N.
COAL FLY ASH
CHEMS FOR BOILER TREAT - ACIDS/BASES

INCIN - BOILER 9, 10 in Y-16
WASTE HEAT BOILER
NOW USED AS INCIN. 1.5 SHIFTS
YIELDS ASH.

R = WWT
SKIM OILS - SELL TO RECLAIM
SLUDGE OFF BOTTOM
CHEMS FOR TREAT

2 TANK FARMS. WWT & BY BLDG H.
STORE FUEL OILS, PRODUCTS.
2 UST - GAS & DIESEL. IN TF 1
AST - OILS, COOL, ANTIFREEZE.
NO TANK WASTE STORE. MAY BE ON PART A
NONE EVER USED.
NO TANK ASSIGNED FOR WASTE.

BLDG C - PURCHASED FINISHED PRODUCTS WAREHOUSE
ELEC CMP / PARTS ETC. AUTO AREA
FORK SERVICE. NO ASBESTOS, OR PCB
CLEAN BLDG.

PROCESS IN F NOW IN K.
1 MI. NORTH.
5,000 g H_2O TO AAD HERE.
PERMIT TO MOVE
SMALL PAINT SYSTEM H_2O - BASE
GM CLEAN SYST

PROP SOLD 1987. SOLAN & MURPHY. LEASED?
S & M IS REALTY.

MEDICAL

88

SAA in Bldg H. Not outside as 90 RCRA Insp
Facility regulated as generator
5,000 gal H_2O System. Caustic & Acid Wash.
Was usually neutral by tank.
Process - 5 stage wash. Process tanks
moved separate.
Bldg F Tank Steel. ~~UAK~~ 5K gals ~~DOC~~
Fuel Oil UST - Steel - for Boilers ~~UAK~~ 15,000 gals
May still be there.
Did have asbestos.
Removal of H_2O 3-4x/day. & Vacuum to Truck
Put into Recovery Area Drain to Eagle System
Bldg F Bought. Em Mfg Facil Prior. 1978?
Sold 1987.

—

Fab: Milling, Drilling, Machining to shape
Welding, Heat Treat.
Chip Tub to RRA - Sorted by Constituent
Steel & Alum to Foundry & Scrap Dealer
2 cy Hopper. Forked to RRA.
End of Line 6 cy to RRA
To Bins to RR Cars. to Mapleton Foundry
Quench Oils - Make up. Closed System
Pump out & Recovery & Reclaim
Exchanged with Vee

SEMI ANNUAL FURLOUGH - 2 WK SUMMER
1 WK CHRISTMAS

COOLANTS TO TRUCK. PERIOD AS NEEDED 1WK - 2 WKS.
TO DRAIN IN BLDG B TO AAO.
ALL COOLANTS TO AAO.
~~PRIMARILY~~ ALL WATER-BASED COOLANTS.
NO STORAGE OF COOLANTS AS WASTE
HYDRAULICS TO AAO. OILS TO DRUM & SKIM OIL
NO OIL RECLAIM AT FACILITY.
CLEANING SOLUTION - PUMPED TO AAO.
SUMP SUCKER. TO DRAIN.
B - DRY PAINT BOOTH. FILTER TO H_2O BASE PAINT
CLEAN 6 WKS - DRUMMED OFF SITE STORE IN RRA
SOLVENT NOT CLEANED
CONTROL WASTE 5U OF CWM IN MENOMONEE WI
CLOSED SYSTEM RECIRCULATE PAINT.
DRUMS TO RRA IMMED. NOT STORE AT AREA.
WELD SMOKE EXTRACTOR. DUST. GOES TO
ROLL OFF. SMALL AMT +/- 3 MOS.
NOT HAZ. < 1 DRUM/YR to LANDFILL
SMALL BAGHOUSE-LIKE DEVICE. NOT AS SPEC. WASTE
IN DRUM NOW. SUMMER 91 1 GAL/3 MOS
SHOT BLASTER - DRUM WASTE → CONTROL WASTE WI
6 DRUMS/MO. RECYC TILL WASTE → DRUM TO
RRA. DRUM NOT MANAGE IN AREA
< ½ FULL DRUM
SINCE DAY 1.

BLDG G - COOLANTS & OILS TO AAO.
PRIMER - WATER BASE PAINT (FLOW COAT)
SPRAY OP - NOT H_2O - HAS SOME SOLVENT
PAINT STRIPPER - CAUSTIC STRIPPER
1 BATH - CLEANED SAME TIME AS PAINT
+/- 6 DRUMS. NaOH - BASED COMMERCIAL SOLN
CLEANED +/- 6 WEEKS BUT NOT EVERY TIME
STRIPS HOOKS & CHAINS.
SOLUTION IS REUSED. SOLIDS REMOVED TO 55-G
SOLUTION → OUT - SOLIDS AWAY DRUM → SOLN BACK.
DRUMS IMMED TO RRA
LARGE MACHINES DRAIN TO AAO - +/- 3 YRS
H. MAY HAVE SAA NEAR PAINT BOOTH.
1 55-G DRUM CLEAN GUNS FROM HAND SPRAY BOOTH
SOLVENT OR PAINT EXCESS.
FILTERS TO H_2O TO ↓ COMBUST
PRODUCTS ONLY 1 SHIFT WORTH.
PRODUCT FLUIDS FROM FILLING LINES TO PIPES TO TANKS

POWDER PAINT - BLDG K
FILTER - UNK
LINED DRAIN TO AAO

COAL FLY ASH - BOILERS - DIRECT TO 20 CY ROLL OFF
GRT LAKES TO CST TO JOLIET
ALWAYS IN ROLL OFF

Semi Annual Furlough - 2 wk Summer
1 wk Christmas

Coolants to Truck Period as needed wk - 2 wks.
To drain in Blog B to AAO.
All coolants to AAO.
~~Primarily~~ All water-based coolants.
No storage of Coolants as waste
Hydraulics to AAO. Oils to drum & Skim Oil
No oil reclaim at facility.
Cleaning Solution - Pumped to AAO.
Sump Sucker. to drain.
B- Dry Paint Booth. Filter to H_2O base Paint
Clean 6 wks - Drummed off site Store in RRA
Solvent not cleaned
Control Waste Div of CWM in Menomonee WI
Closed System Recirculate Paint.
Drums to RRA immed. Not Store at area.
Weld Smoke Extractor. Dust. Goes to
Roll off. Small Amt +/- 3 mos.
Not Haz. < 1 drum/yr to Landfill
Small Baghouse-like device. Not as Spec. Waste
in Drum now. Summer 91 1 gal / 3 mos
Shot Blaster - Drum waste → Control Waste WI
6 drums/mo. Recyc till waste → drum to
RRA. Drum not manage in area
< 1/2 Full drum
Since Day 1.

BLDG G - COOLANTS & OILS TO AAO.
PRIMER - WATER BASE PAINT (FLOW COAT)
SPRAY OP - NOT H_2O - HAS SOME SOLVENT
PAINT STRIPPER - CAUSTIC STRIPPER
1 BATH - CLEANER SAME TIME AS PAINT
+/- 6-8 DRUMS. NaOH - BAGGED COMMERCIAL SOLN
CLEANED +/- 6 WEEKS BUT NOT EVERY TIME
STRIPS HOOKS & CHAINS.
SOLUTION IS REUSED. SOLIDS REMOVED TO 55-G
SOLUTION → OUT - SOLIDS AWAY DRUM → SOLN BACK.
DRUMS IMMED TO RRA
LARGE MACHINES DRAIN TO AAO. +/- 3 YRS
H. MAY HAVE SAA NEAR PAINT BOOTH.
1 55-G DRUM CLEAN GUNS FROM HAND SPRAY BOOTH
SOLVENT OR PAINT EXCESS.
FILTERS TO H_2O TO ↓ COMBUST
PRODUCTS ONLY 1 SHIFT WORTH.
PRODUCT FLUIDS FROM FILLING LINES TO PIPES TO TANKS

POWDER PAINT - BLDG K
FILTER - UNK
LINED DRAIN TO AAO

COAL FLY ASH - BOILERS. DIRECT TO 20 CY ROLL OFF
GRT LAKES TO CAT TO JOLIET
ALWAYS IN ROLL OFF

Sulfuric Acid, Lime as Softener prior to Boilers
Boiler Blowdown to AAO.

Incin Yield Ash in Pile. Pile in Rec Area.
Incin in Rec Area. Ash on Concrete.
1981

WWT - 1968 - DAF add shortly after.
Discharge under Locan
2x/Mo - Look at BOD, COD, pH, metal
past En excursions. Since relocate to K
on Reg Basis no Probs.
Skim oil to Bulk Tank 5,000 g Concrete.
Removed by Metalworking
Pipes to Tank. 1 tank / wk a 1.5 wk.
Sludge to Tub by Conveyor. Tubs to Tank
at end of System. Tank also holds DAF
Sludge. Pipe by Gravity.
10 K g / week 2 x 30,000 g tank.
Concrete. Not lined, Sealed. 8" thick.
Same as oil tank
Check PH + Emulsion Breaker - Annex post Sep.
Adjust as need.

Storage

Bldg C - Auto. Now in GBH. Main is "X"
Main X - mason work. Recharged.

NO OTHER BLDG C WASTES

BLDG F WAS SEPARATE NUMBER. STRICTLY A GENERATOR. PROP GOVT. NOT OCCUPIED BY CAJ

TANK FARMS.

USTs TANK FARM 1 BY BLDG R.

NO PCBs in Q. STORE AREA FOR CAPACITOR FROM MACHINE. STORE in Q. NOT in TRANSFORMERS.

USTs D-W w/ MONITOR & ALARM.

STEEL. TANK FARM 1 12K-15K 6

TF 2 STEEL - ALL AST.

MEDICAL

SHARPS / BANDAGE

MANAGE AS MEDICAL WAST

BF1 INCIN - UNKOWN DETAILS

NO COMPLAINTS NOISE & CAUSE OF BERM.

CHIP TURNING DUMPSTER. MACHINE OPS IN B COATED @ SEMI SYNTH COOLANT. SOME DRAG OUT COOLANT IS BY INDIV MACHINE. RECIRCULATES. HOPPER SINCE 50s. WILL GO TO LG HT LINE END. WOOD BLOCK FLOOR. COATED W/ ASPHALT

PIPING IS ASBESTOS. INSULATED. O & M PLAN. CONTRACTORS FOR ASBESTOS REMOVAL.

CHIP DUMPSTER AT END OF LINE. RECEIVES METAL FROM INDIV. MACHINES. MINOR SCRAP & OIL ON FLOOR BRICK CONCRETE LINED WITH METAL FOR BASIN HOLDING DUMPSTER

QUENCH OIL IS CLOSED CIRCULATION SYSTEM. LOSS IS ONLY INCIDENTAL LOSS DURING PROCESS. NO WASTE — UNLESS EPISODIC DRAINING OF SYSTEM. THEN PUMPED DIRECT TO TANKER FOR TRANSPORT TO RECYCLER. TANK IS UP TO 30 K g. NO FILTERS ON SLUDGE. STEEL LINED TANK. INSIDE CONCRETE

SEPARATE BURNABLE RUBBISH STORED IN DUMPSTER WILL GO TO INCINERATOR.

SHOT BLAST. MATERIAL VACUUMED TO DRUM. DRUM TO RECLAMATION AREA. LANDFILLED BY CONTROLLED WASTE - CWM in WISCONSIN. SINCE 50s. SHOT BLAST ON FLOOR WILL BE SWEPT & PLACED IN BARREL. AREA COVERED W/ WOOD AND CARPET TO CONTROL SLIPPING. DRUM IS 55 g. SITS IN TUB. DUCT INTO DRUM DIRECT.

DRUMMED PRODUCT STORAGE. PALLETIZED. CLEAN.

AUTOMOTIVE in BLDG X. FIXTURE STORE. HOOKED TO AAO. LIQUIDS TO DRAIN.

DRY PAINT SYSTEM - BLDG G.
AIR PULLS PAINT THRU FLOOR FILTERS. LOW WASTE FILTERS INTO WATER TO ↓ COMBUSTION.
WASH SPRAY TO AAO. MANUAL SPRAY. WITH CAUSTIC TO CLEAN. GOES TO AAO in FLOOR TRENCH. PAINT SINCE 1965.

COAT SYSTEM b

CAUSTIC WASH → FLOW COATER → HEAT oven
FLOW coater is CONTINUOUS PAINT SYSTEM.
CAUSTIC WASH → PAINT → BAKE oven

PAINT STRIPPER IN BLDG 6 AT SW CORNER. REMOVE PAINT FROM HOOKS AND CHAINS. DIP TANK. VENTS TO OUTSIDE. HAS 8" CEMENT BERM AROUND. USE SINCE '68. NO RELEASES BERM IS SMASHED DUE TO ABRASION. WON'T CONTAIN VOLUME. LIQUID TO ADJACENT TANK. SHOVEL SLUDGE TO DRUMS. TO RECLAIM. D002 CORROSIVE. SODIUM HYDROXIDE. DRAIN IN CONTAIN TO AAO. VOL? TWO TANKS. 1SM 1LG. STEEL TANKS. LOOKS CLEAN. NO FILTER ON VENT.

ALL FLOOR DRAINS TO AAO.
WASHER TO AAO.

HAD H_2O-BASE PAINT SPILL. A COUPLE OF YRS AGO 85-86. NEEDED SPILL # TO REMOVE SOIL. 5 YDS REMOVED. WENT TO SETTLER'S HILL IN BATAVIA. WERE DIGGING HOLE NEXT TO AUTOMATED LINE IN BLDG 6. PART DRIPPED INTO OPEN HOLE. H_2O BASE PAINT. NO POST REMOVAL TEST. VOL WAS 1 PINT. PAINT TACKY - not LIQUID. EASY TO SEE & REMOVE.

BUILDING G FUME EXTRACTOR. PUT IN LAST SUMMER. UNK. ANAL. GOES INTO 1 GAL BAG AS DUST. MOST GETTING RID AS INDUST. WASTE. NOT MUCH VOLS. SEVERAL HOOKED TO ARC WELDER. VACUUMS INTO BAG. IS FORIT. IS PVC PIPE & FLEX PIPE TO WELD ARM. PRIOR TO SYSTEM, VENT TO AIR.

FAC HAS DONE AIR STUDIES. NO PROBLEMS. MAY BE NEW REG.

MEDICAL WASTE.
RED TAGGED BIO HAZARD. TAKEN TO BLDG B.
TRUCK PICK UP 1x/mo.
SHARPS IN SHARPS CONTAINER.
MANAGED IN WASTE BASKET.
56/68 MEDICAL AREA

BUILDING H. PART-TIME SAA NEXT TO PAINT BOOTH
SOLVENT BASED PAINT. ONLY FILTERS.
DRUM LABELED WASTE. NONE (WASTE) OVER UST.
PRODUCT DRUMS. '68 DATE. NO SPILLS.
NO SEPARATE MARKED AREA
DON'T USUALLY HAVE SAA, ONLY IF CHANGE CLOTHES OR ANNUAL
ASSEMBLY IN H. NO WASTE PAINT IS IR cured.

INCINERATOR - FROM 4-16 TO OPEN CEMENT PAD. AREA IS SLOPED & DRAINS TO AAO. IS ALL FENCED IN AS RECLAMATION AREA. GOES TO ENVIROTECH IN MORRIS BY 20 CY ROLLOFF MOVED BY WHEEL LOADER.

SCRAP - STORED ON CEMENT. IN BINS. LOADED TO RR CARS BY CRANE. RR TRACK ADJACENT. BINS TO AAO FAIRLY CLEAN.

EMPTIES (55-G) PLASTIC DRUMS WAIT FOR VENDOR CEMENT IS 12" THICK

WHOLE AREA IS FENCED SEPARATE FROM PERIMETER.

DRUM STORAGE. OLD - FORMAL CLOSURE. D001 & D002 DATES 7/6 1/86.
AREA TO AAO. STORED SINCE 1956. SIZE OF AREA? 34 x 90. REMARKABLY CLEAN. DRUM
NO RELEASE. ONE LEAK. OVERPACKED. NO CHAR WASTE

SOME BLOWING DUST FROM INCIN ASH.

14,000 CU YDS INC

T FARM 1- 2 FIBER 12,000 UST. OLD STEEL.
NO RELEASE. DRAINS TO AAO.
— UNDERGROUND PIPES & ALARM
WET WELL TO PUMP TO HOLDING.
WET WELL IS CEMENT. HOLD 10K gals
ADD POLYMER. USED TO ADD ALUM (AL SULFATE)
SODA ASH & SULFURIC FOR pH ADJUST.
—
API SEPARATOR. TOP TO HOLD TANK.
CONVEYOR TO METAL SLUDGE CONTAINERS.
WATER TO 1 x 3 100K gal HOLD TANK
OIL HOLD PUMPED TO TANKER TO
METALWORK LUBRICANTS in INDIANAPOLIS.
KEPT SEP FROM BOTTOM
BOTTOM TO 2 cy WAT TIGHT HOPPERS.
TO ML BUT KEPT SEP.
12" CEMENT. CLEANED & INSPECTED.
SLUDGE TANK 2 x 30 K

DAF SLUDGE & FLOAT TO SLUDGE P.T.
VERY CLEAN GOOD REPAIR
THEN TO MUNI

2 WASTE HEAT BOILER. In in 81
PAPER CARDBOARD PLASTIC WOOD.
UNK RELEASE CONTROL ON STACK.
FLOOR TO AAO. VOL IS 14000 CY ASH
+/- 1011 14000 CU WASTE. 1000 CY ASH / MO.
SHREDDER & CONVEYOR TO PILE. LOADER SHOVELS
IN LOAD. CYCLE 1/7 MINUTES.
FLOOR VERY CLEAN.

20 CY Roll off. FLY ASH: TO CAT & JOLIET
3,000 YDS.
BAGHOUSE - Contractor changes. Start in
1981. BOILERS SO LOWER K4 SULF COAL.
NO SCRUBBER. USE LOW SULF COAL.

BLDG Q - N OF R - N WALL. DRUM STORE FOR
PCB CAPACITOR. PUT IN DRUM & OIL DRY.
A FEW CAPACITORS / DRUM / YR.
IS 10' x 3'. ONE EMPTY DRUM. 1 FILLING DRUM
STEEL EPOXY PAINT COATED BIN. 8" HIGH. LABELLED.
Clean. NO RELEASES. PRE - 80 USE.
DRAIN TO AAO. IS TRANFORMER BUILDING
BUT NO PCB.

FORMER WASTE - LIME SLURRY. SPECIAL.
BOILER WATER TREAT. NOW to AAO.
HEAT TREAT SMALL oil FIRES - CO_2 SYSTEM.
SHUTS DOWN SYSTEM.
No OPEN BURNING.
ACCIDENTS - NO MAJOR.

Medical in "B" BFI RED BAGS
BRINE BOXES, BAGS, SHARPS.
INCINERATION. 1/mo.
BUILDING G → BUILD B.
BANDAGES. ANY TYPE OF BODY FLUIDS.
PHYSICAL, DRUG SCREEN. FIRST AID.
WILL START SALARIED.

Illinois Environmental Protection Agency · P. O. Box 19276, Springfield, IL 62794-9276

217/782-6762

Refer to: 0938070002 -- Kendall County
Aurora/Caterpillar, Inc.
ILD005070651
RCRA Permits

August 24, 1989

Karl E. Bremer, Chief
Technical Program Section
U.S. Environmental Protection Agency
Region V
230 South Dearborn
Chicago, Illinois 60604

Dear Mr. Bremer:

Enclosed you will find a copy of the Certification Regarding Potential Releases from Solid Waste Management Units for the above referenced facility and/or the reply the Agency received in response to our request for information regarding the above.

If you have any questions regarding this initial screening, please contact David Deisher of my staff at 217/782-6762.

Very truly yours,

Lawrence W. Eastep, P.E., Manager
Permit Section
Division of Land Pollution Control

LWE:DWD:jab/2935k/18

Enclosure

cc: Division File
USEPA Region V -- Mary Murphy
FOS Maywood Region

Attachment 2

CERTIFICATION REGARDING POTENTIAL RELEASES FROM SOLID WASTE MANAGEMENT UNITS (CLOSURE PLAN REVIEW)

FACILITY NAME: Caterpillar Inc.

EPA I.D. NUMBER: ILD005070651

LOCATION CITY: Aurora

STATE: Illinois

1. Are there any of the following solid waste management units (existing or closed) at your facility? NOTE - DO NOT INCLUDE HAZARDOUS WASTES UNITS CURRENTLY SHOWN IN YOUR PART A APPLICATION and in your closure plan.

	YES	NO
• Landfill		X
• Surface Impoundment		X
• Land Farm		X
• Waste Pile	X	
• Incinerator	X	
• Storage Tank (Above Ground)		X
• Storage Tank (Underground)		X
• Container Storage Area		X
• Injection Wells		X
• Wastewater Treatment Units	X	
• Transfer Stations		X
• Waste Recycling Operations		X
• Waste Treatment, Detoxification		X
• Other _____		

2. If there are "Yes" answers to any of the items in Number 1 above, please provide a description of the wastes that were stored, treated or disposed of in each unit. In particular, please focus on whether or not the wastes would be considered as hazardous wastes or hazardous constituents under RCRA. Also include any available data on quantities or volume of wastes disposed on the dates of disposal. Please also provide a description of each unit and include capacity, dimensions, location at facility, provide a site plan if available.

Incinerator - burns non-hazardous cardboard, non-PCV plastic, paper and wood materials. An analysis of the ashes is attached. The waste ashes contain no hazardous constituents under RCRA. The incinerator is shown on the facility map as Buliding Y16 - southwest of Building B. Reference: Illinois Air Emissions Permit No. 81030035. The incinerator burns a maximum of 2,972 lbs. per hour. It is operated at a maximum 6 days a week, 49 weeks per year. See attached for information on Waste Pile and Waste Water Treatment units - Page 1a.

WASTE PILE

The waste pile consists of ashes from the waste heat boilers (incinerator). An analysis of the ashes has been submitted with the closure plan. The maximum capacity of the pile area is about 100 cubic yards. The area is about 30' x 30' surrounded on three sides by a 4 foot concrete wall. The area is located next to our waste drum storage area in Reclamation. See Bulk Storage Bin on Figure 3.

WASTEWATER TREATMENT UNIT

The wastewater treatment unit is a primary system that treats our industrial process water. The treatment includes oil separation, emulsion breaking, pH adjustment, if needed, and dissolved air flotation. We are regulated by the Metal Finishing Pretreatment Regulations with the Aurora Sanitary District as our controlling agency. We currently treat about 200 gallons of water per day with a one-shift operation. The facility is located in our Building R on the east side of the plant. See the facility map in Figure 2.

NOTE: Hazardous waste are those identified in 40 CFR 261. Hazardous constituents are those listed in Appendix VIII of 40 CFR Part 261.

3. For the units noted in Number 1 above and also those hazardous waste units in your Part A application and in your closure plan, please describe for each unit any data available on any prior or current releases of hazardous wastes or constituents to the environment that may have occurred in the part or still be occurring.

   Please provide the following information

   a. Date of release
   b. Type of waste released
   c. Quantity or volume of waste released
   d. Describe nature of release (i.e., spill, overflow, ruptured pipe or tank, etc.)

Not Applicable

4. In regard to the prior releases described in Number 3 above, please provide (for each unit) any analytical data that may be available which would describe the nature and extent of environmental contamination that exists as a result of such releases. Please focus on concentrations of hazardous wastes or constituents present in contaminated soil or groundwater.

Not Applicable

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the submittal is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations. (42 U.S.C 6902 et seq. and 40 CFR 270.11(d))

CERTIFICATION REGARDING POTENTIAL RELEASES FROM
SOLID WASTE MANAGEMENT UNITS
(CLOSURE PLAN REVIEW)

Alan J. Rassi - Plant Manager
Typed Name and Title

Alan J. Rassi
Signature

8/18/89
Date

CATERPILLAR TRACTOR CO.

Box 348
Aurora, Illinois 60507

February 25, 1986

U.S. Environmental Protection Agency
Region V
Solid Waste Division Administrator
230 So. Dearborn
Chicago, Illinois 60604

Dear Sir:

We would like to submit the following waste minimization plan to comply with RCRA requirements (40CFR 262.41).

Currently, we generate and dispose of two hazardous wastes. A plan for each waste is listed below.

Solvent Based Paint Sludge - The paint type for finish coat was changed to a high solids type. The new paint results in less overspray and causes less paint build up. As a result paint usage was reduced. Waste paint sludge volume was reduced by 60% over the 1984 volume. Future plans to further reduce the volume and toxicity of the waste include investigating distillation equipment to recover the remaining solvent. The distilled solvent would then be used for cleaning of equipment. The residue would be less toxic and the volume would be reduced by an anticipated 40%

Paint Stripper Sludge - To reduce the need for paint stripping operations, more of the larger hard to paint parts are being painted in manual paint booths. This results in less overspray and excessive paint build-up on parts and material handling equipment. Paint stripper waste volume was reduced by 60% over 1984 volume. In the future we are investigating sludge dewatering or neutralization equipment to further reduce volume and toxicity.

If you have any questions, please contact Ann Hastert, Environmental Coordinator at (312)859-5417 for information.

Sincerely,

Gerald S. Flaherty
Plant Manager

CERTIFICATION REGARDING POTENTIAL RELEASES FROM
SOLID WASTE MANAGEMENT UNITS

FACILITY NAME: CATERPILLAR TRACTOR CO.

EPA I.D. NUMBER: ILD005070651

LOCATION CITY: AURORA

STATE: IL

1. Are there any of the following solid waste management units (existing or closed) at your facility? NOTE - DO NOT INCLUDE HAZARDOUS WASTE UNITS CURRENTLY SHOWN IN YOUR PART A APPLICATION

	YES	NO
° Landfill		X
° Surface Impoundment		X
° Land Farm		X
° Waste Pile		X
° Incinerator		X
° Storage Tank (Above Ground)		X
° Storage Tank (Underground)		X
° Container Storage Area		X
° Injection Wells		X
° Wastewater Treatment Units		X
° Transfer Stations		X
° Waste Recycling Operations		X
° Waste Treatment, Detoxification		X
° Other NA		

2. If there are "Yes" answers to any of the items in Number 1 above, please provide a description of the wastes that were stored, treated or disposed of in each unit. In particular, please focus on whether or not the wastes would be considered as hazardous wastes or hazardous constituents under RCRA. Also include any available data on quantities or volume of wastes disposed of and the dates of disposal. Please also provide a description of each unit and include capacity, dimensions and location at facility. Provide a site plan if available.

NOTE: Hazardous wastes are those identified in 40 CFR 261. Hazardous constituents are those listed in Appendix VIII of 40 CFR Part 261.

3. For the units noted in Number 1 above and also those hazardous waste units in your Part A application, please describe for each unit any data available on any prior or current releases of hazardous wastes or constituents to the environment that may have occurred in the past or may still be occurring.

   Please provide the following information

   a. Date of release
   b. Type of waste released
   c. Quantity or volume of waste released
   d. Describe nature of release (i.e., spill, overflow, ruptured pipe or tank, etc.)

No releases to date of hazardous waste materials from listed hazardous waste units.

4. In regard to the prior or continuing releases described in Number 3 above, please provide (for each unit) any analytical data that may be available which would describe the nature and extent of environmental contamination that exists as a result of such releases. Please focus on concentrations of hazardous wastes or constituents present in contaminated soil or groundwater.

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the submittal is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations. (42 U.S.C. 6902 et seq. and 40 CFR 270.11(d))

GERALD S. FLAHERTY - Plant Manager
Typed Name and Title

Signature

2/26/86
Date

CONTINUING RELEASES AT PERMITTED FACILITIES

SEC. 206. Section 3004 of the Solid Waste Disposal Act is amended by adding the following new subsection after subsection (t) thereof:

"(u) CONTINUING RELEASES AT PERMITTED FACILITIES.—Standards promulgated under this section shall require, and a permit issued after the date of enactment of the Hazardous and Solid Waste Amendments of 1984 by the Administrator or a State shall require, corrective action for all releases of hazardous waste or constituents from any solid waste management unit at a treatment, storage, or disposal facility seeking a permit under this subtitle, regardless of the time at which waste was placed in such unit. Permits issued under section 3005 shall contain schedules of compliance for such corrective action (where such corrective action cannot be completed prior to issuance of the permit) and assurances of financial responsibility for completing such corrective action.".